Inspection Report Cover Sheet for RCRA Contractor Inspections in Iowa

TO BE COMPLETED BY THE ENSV ADMINISTRATIVE ASSISTANT. Please complete one cover sheet per original inspection report and affix this cover sheet to the top of the report.

1. Your name: Donna Arnold
2. Date document was submitted to the Records Center (MM/DD/YY): 10 / 19 / 10
3. a. Facility/Company or Site Name: Henniges Automotive Iowa, Inc.

   b. Facility address: 3200 main St, Keokuk, IA.

   c. EPA ID number: IAD005136023
4. Inspection Date(s): 7/20/10
5. Inspector's Name and Division/Branch: Gary Witkovski, EFCB, ENSV
6. Applicable Program (RCRA/Multimedia, etc.): _____
7. Number of pages in the inspection report: 125

NOTES TO RECORDS CENTER:

- Please scan and process this report in accordance with the "PROCEDURE FOR DIGITIZING AND COPYING INSPECTION REPORTS (7/6/07).
- Please file this report in **Doc Category: Enforcement**

ENSV Inspection Transmittal Summary Report

Media: RCRA CONTRACTO

Inspection Type: CEI

Inspection Date: 07/20/2010

Preliminary SNC Findings: No

NOV / NOPV / NOPF: Yes

Inspector: TTE CONTRACTOR TTE CONTRACTOR

Transmittal Date:

Facility Name:
Hennings Automotive Iowa Inc.

Address:
3200 Main St.
Keokuk
IA
52632

ID Number: IAD005136023

Activity Number:

MM Participationg Progams:

Federal Activity:

Federal Facility: No

Potential EJ: No

SBREFA Provided:	Security Handout Provided:	MM Screening Completed:	EMS ISO 14001:	Compliance Officer:
Yes	Yes	Yes	No	BETH KOESTER

Selection Criteria 1: Full Enforcement TSD

Selection Criteria 2: IA LQG

ACS Code: RCRA01

Inspection Findings:

-Failure to maintain closed SAA containers
-Failure to mark/label a container with the words "used oil"
-Failure to mark an accumulation date on a container in the less than 270 day container storage area located in the SAA 1 Area and 228 Area
-Failure to close containers in the less than 270 day container storage area located in the SAA 1 Area
-Failure to inspect the less than 270 day container storage area located in the 228 Area on a weekly basis
-Failure to keep universal waste lamps in closed containers

Comments:

Target Quality:

N/A

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

HENNIGES AUTOMOTIVE IOWA, INC.
3200 Main Street
Keokuk, Iowa 52632
319-524-4560

EPA ID Number: IAD005136023

On

July 20, 2010

By

TETRA TECH EM INC.

For

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Environmental Services Division

INTRODUCTION

At the request of the Environmental Services Division and the Air and Waste Management Division of the U.S. Environmental Protection Agency (EPA) Region 7, Tetra Tech EM Inc. (Tetra Tech), conducted a hazardous waste compliance evaluation inspection (CEI) at Henniges Automotive Iowa, Inc., (Henniges), located at 3200 Main Street, Keokuk, Iowa. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. As requested by the EPA compliance officer for the facility, the CEI covered hazardous waste generator requirements, used oil management, and universal waste requirements. This report and its attachments present the results of the RCRA CEI. Tetra Tech also conducted a Level B multimedia screening inspection at Henniges. The Multimedia Screening Checklist is included as Attachment 1.

PARTICIPANTS

Henniges:

Joe P. Lehrter, Senior Environmental Health and Safety Specialist
Larry D. Lasater, Human Resource Manager

Tetra Tech:

David H. Homer, Senior Environmental Scientist, 816-412-1762

INSPECTION PROCEDURES

Prior to the CEI at Henniges on July 20, 2010, I conducted a drive-by inspection. I did not observe any areas of concern during the drive-by. I entered the lobby of the main building and used the phone to attempt to contact Mr. Joe Lehrter and left a voice message that explained the purpose of the visit. I then called a person in administration and explained that I was there to conduct a CEI. She paged Mr. Lehrter, who met me in the lobby and accompanied me to his office. I presented my business card and EPA credentials letter and explained the procedures for the CEI. I also explained the facility's right to make confidentiality claims and provided Mr. Lehrter the Confidentiality Notice (Notice), which he read. I stated that, at the conclusion of the CEI, he would be given an opportunity to make or not make a claim of confidentiality. I also provided Mr. Lehrter a copy of U.S. Federal Code 1001 and 1002, which he read, concerning communication of false statements and documents to federal inspectors.

I reviewed the RCRA Info Data Verification Handler Information Report with Mr. Lehrter. I updated (1) the types of regulated activity, and (2) waste codes on the Handler Information Report (see Attachment 2). I conducted the visual inspection of the facility, accompanied by Mr. Lehrter. I also conducted a review of the facility's records, including manifests with land disposal restriction (LDR) notices, and waste characterization documentation (including material safety data sheets [MSDS]). Facility information gathered during the CEI is documented on the Data Gathering Worksheets and Checklists (see Attachment 3).

During the exit briefing at the conclusion of the CEI, I summarized my findings to Messrs. Lehrter and Larry Lasater. I provided Mr. Lehrter a Receipt For Documents And Samples, which he signed acknowledging receipt (see Attachment 4). I also provided Mr. Lehrter the Notice, which he signed to indicate no confidential business information (CBI) had been provided (see Attachment 5). I then provided Mr. Lehrter a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (see Attachment 6). A map of the facility is included as Attachment 7. Photographs taken during the CEI are in Attachment 8.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Henniges began operating at this facility in 1906 and currently employs approximately 450 mostly full-time staff. The Henniges facility is comprised of multiple additions to the original structure that are now all under one roof, and two or three outbuildings. All buildings together comprise approximately 750,000 square feet under roof. Mr. Lehrter did not know the total plant area. Based on my review of aerial photographs after the inspection, I concluded the facility area is approximately 48 acres. Henniges currently operates three 8-hour shifts per day (7 a.m. to 3 p.m., 3 p.m. to 11 p.m., and 11 p.m. to 7 a.m.), Monday through Saturday. Henniges manufactures rubber weather stripping for a variety of domestic automobile manufactures.

In the mixing area, Henniges mixes oil, polymers, carbon black, and calcium carbonate to form a rubber compound. This compound is then extruded into various types of weather stripping for the automotive industry. Henniges has 13 extrusion lines to produce a wide variety of products. The weather stripping is either coated or flocked. The facility has four lines that apply a solvent-based coating and nine lines that apply a water-based coating. Depending on the specific use of the product, Henniges may insert metal or other rigid materials in the rubber to make what it terms "supported weather stripping." Henniges terms the remaining product "unsupported weather stripping." Henniges also applies a polyester flocking material with an adhesive to some of the weather stripping. Waste streams generated during manufacturing of the weather stripping are bag house dust, raw rubber waste, waste rubber (supported and unsupported), waste solvents with resins and adhesives, waste flammable liquids, and waste paint.

During facility and equipment maintenance, the facility generates spent parts washing solvent, used oil and absorbents, waste lamps, waste batteries, waste mercury-containing devices, electronic wastes, spent lead-acid batteries, scrap metal, and general office trash.

In August 2005, EPA contractor Booz Allen Hamilton conducted a CEI. At the time of the CEI, Henniges was a large quantity generator (generating more than 1,000 kilograms [kg] of hazardous waste per month). During the 2005 CEI, the following preliminary findings were identified:

- Failed to date a hazardous waste container in the less-than-90-day hazardous waste storage area, as required by Title 40 *Code of Federal Regulations* (40 CFR) 262.34(a)(2).
- Failed to keep containers of universal waste lamps closed and in good condition, as required by 40 CFR 273.13(d)(1).

2. RCRA Status

Henniges is identified as a small quantity generator (SQG) on the RCRA Info Data Verification Handler Report provided by EPA (see Attachment 2), generating between 100 and 1,000 kg of hazardous waste per month. Based on my review of the facility's waste disposal inventory and discussions with Mr. Lehrter, the facility generates a monthly average of 500 pounds (227 kg) of hazardous waste (D001, F003, F005, D022), consisting primarily of waste solvent, resin, adhesive mixture, and waste flammable solvents. Henniges is also a used oil generator and small-quantity handler (SQH) of universal waste lamps, batteries, and mercury-containing equipment (accumulates less than 5,000 kilograms of universal waste at any time). The Badger Disposal facility in Milwaukee, Wisconsin, is more than 200 miles from the Henniges facility (325 miles); therefore, per 40 CFR 262.34(e), the facility's allowable accumulation time is extended from 180 days to 270 days.

The facility accumulates hazardous waste in one less-than-270-day container storage area (CSA). In addition, the facility has 8 satellite accumulation areas (SAA); these locations are identified on the facility map (see Attachment 7):

- SAA – No. 2 in the Mixing Room
- SAA – No. 3 in the Tool Crib
- SAA – No. 4 in the Line 7 Area
- One SAA in the C170 Area (not numbered by the facility)
- Four SAAs in the Cement Building – Nos. 6, 7, and 8, and the Solvent Rag SAA (not numbered by the facility).

In addition, the facility has two areas that it considers the ninth and tenth SAAs. One is in the 228 Area; Mr. Lehrter did not know if this SAA had a numerical designation. The other is SAA – No. 1, which is in the Oven Line 2 Area. However, because the containers in these two areas held more than 55 gallons, I inspected them as a less-than-270-day CSAs.

Used oil is stored in an aboveground storage tank (AST) in the indoor tank room, and universal waste is stored in two locations at the facility for only universal wastes.

3. Waste Streams

Section 3 describes the waste streams generated by the facility, including the facility's waste determination and waste codes; generation process and rate; on-site management; and ultimate disposition. The following discussion of waste streams is based on conversations with Mr. Lehrter and the visual inspection. During the visual inspection, I was accompanied by Mr. Lehrter. The visual

inspection included the mixing area, the primary CSA, the 228 area CSA, the Oven Line 2 CSA ("SAA – No. 1"), the 8 SAAs, the facility's maintenance area, and universal waste storage areas. All inspection participants were provided a copy of U.S. Federal Codes 1001 and 1002, which they read.

Raw rubber waste is generated during formulating and mixing of the rubber compound used to make the weather stripping. The facility has determined that the waste is nonhazardous, based on MSDSs of the raw materials used to make the rubber compounds—oil, polymers, carbon black, and calcium carbonate. I reviewed the MSDSs during the CEI and concluded that the waste determination was adequate. The rubber mixing waste is collected in cardboard containers (gaylord boxes) at various locations (see Attachment 8, Photographs 1 and 2). The facility generates approximately 15,000 pounds per month of rubber mixing waste. The rubber mixing waste is collected by North Cedar Recycling – South of Keokuk, Iowa, for recycling.

Bag house dust is generated in the mixing area. In this area, carbon black, polymers, and calcium carbonate are mixed together in dry form before going into the rubber polymerization process. Two bag houses in this area collect the fines from the mixing process. The dust collected in the bag houses are deposited into cloth totes at the base of the bag house (see Attachment 8, Photographs 3 and 4). Henniges has determined this waste stream is nonhazardous based on product knowledge (MSDSs of the raw materials). Henniges generates approximately 4 cubic yards of bag house dust per month, and it is sent to Backridge Landfill in La Grange, Missouri, for disposal.

Waste carbon black is generated at the carbon black unloading area. As Henniges transfers the carbon black from rail cars to the holding tanks, occasional releases of the material occur; this released material is swept up and placed in 55-gallon steel containers (see Attachment 8, Photograph 5). Henniges has determined that this waste stream, accumulating at a rate of approximately 55 gallons per month, is nonhazardous based on product knowledge. The waste carbon black is sent to Backridge Landfill in La Grange, Missouri, for disposal.

Waste solvent with resin and adhesive is generated at numerous locations throughout the facility. The waste is generated from flushing the adhesive spray lines, cleaning spray guns, and collecting excess adhesive. The primary solvent used is toluene, although isopropanol and naphtha are also utilized as solvents specific to particular adhesives or resins. Henniges has determined that this material is a hazardous waste, and applies the waste code D001 to it. Mr. Lehrter stated that the facility uses the D001 waste code because most of the waste is waste resin directly from the production lines, and line flushing

waste is less than 10 percent of the volume. The wastes are collected in SAAs throughout the facility. When SAA containers are full, they are transferred to the primary CSA. Most of the SAAs I observed were 55-gallon steel containers; many were located in flammable cabinets. All SAA were under the control of the operator and within 100 feet of the point of generation. Waste solvent with resin and adhesive is transported to Badger Disposal of Milwaukee, Wisconsin, for fuel blending. It was last collected on June 8, 2010 (see Attachment 9, page 1).

During the visual inspection of SAA No. 1, I noted an open-topped cardboard box with the words "hazardous waste" on the outside (see Attachment 8, Photograph 6). Mr. Lehrter stated that this container was being used as a SAA for the Oven Line area. It contained various smaller containers (1- to 3-gallon buckets), some of which contained waste solvent and adhesive mixtures (see Attachment 8, Photograph 7). This waste solvent and adhesive mixture was to be transferred to the adjacent 55-gallon container in the flammable closet (see Attachment 8, Photograph 8). In consultation with EPA after the inspection, it was determined that the cardboard box contained more that 55 gallons of containers with hazardous wastes and therefore the cardboard container is a less-than-270-day storage container and not a SAA container. The cardboard container was not closed, as required by 40 CFR 262.34(d)(2) referencing 265.173(a) (**NOPF No. 6**). Also, the container did not have an accumulation date as required by 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2) (**NOPF No. 3**). The container was labeled and in good condition. According to Mr. Lehrter, the transfer occurs once per week. Since the cardboard container contents are removed once a week, I assumed the waste had not been in the cardboard container for longer than 270 days.

Adjacent to the cardboard container was a flammables cabinet with a 55-gallon steel container of hazardous waste (see Attachment 8, Photograph 8). Based on discussions with EPA after the inspection, it was determined that the cardboard container is not a SAA, but a less–than-270-day CSA, because waste from a storage container can only be transferred to another storage container. Therefore, the 55-gallon steel container is also a less-than-270-day storage container. The container was in good condition and labeled as a hazardous waste. The waste solvent/adhesive mixture is placed in the funnel on the top of the container and allowed to drain into the container. I did not observe a lid on the funnel; therefore the container was not closed as required by 40 CFR 262.34(d)(2) referencing 265.173(a) (**NOPF No. 6**). In addition, the container did not have an accumulation date as required by 40 CFR 262.34(d)(4) referencing 262.34(a)(2) (**NOPF No. 3**). According to Mr. Lehrter, it takes approximately 3 to 4 weeks to fill this container; I assumed the waste had not been in the container for longer than 270 days. Mr. Lehrter also

stated that both containers are inspected each week during the transfer process, although no inspection logs are kept.

The next SAA I observed was SAA No. 3, in the tool crib area (see Attachment 8, Photograph 9). I did not observe a lid on the funnel, therefore the container was not closed as required by 40 CFR 262.34(c)(1)(i) referencing 265.173(a) (**NOPF No. 1**). The container was in good condition, labeled, near the point of generation, and held approximately 30 gallons of waste. The waste solvent adhesive mixture was extremely viscous and did not flow from the funnel into the container (see Attachment 8, Photograph 10). Mr. Lehrter noted that the hazardous waste technician, Mr. Dennis Gates, periodically has to scrap the funnel's contents into the container when it becomes too viscous to flow into the container.

The next SAA I observed was SAA No. 4 in the Line 7 Area (see Attachment 8, Photograph 11). I did not observe a lid on the funnel; therefore, the container was not closed as required by 40 CFR 262.34(c)(1)(i) referencing 265.173(a) (**NOPF No. 1**). The funnel for this container did not have the same material as noted in previous observed funnels (see Attachment 8, Photograph 12). The container was in good condition, labeled, near the point of generation, and held approximately 10 gallons of waste. This SAA flammables cabinet had a set of instructions for management of the hazardous waste in this SAA (see Attachment 8, Photograph 13).

The next SAA for this waste stream that I observed was SAA No. 2 in the mixing room (see Attachment 8, Photograph 14). The container was in good condition, labeled, near the point of generation, and had a lid on the funnel on the top of the container. The container held approximately 30 gallons of waste.

The next area that I observed was a container in the 228 Area, which the facility considered an SAA. The container was closed, labeled, and in good condition (see Attachment 8, Photograph 15). It was not dated. I noted the container was full by removing the funnel and looking inside the container. I removed the lid of the funnel and noted that it was also full (see Attachment 8, Photograph 16), for a total of more than 55 gallons of waste. Mr. Lehrter did not know how long this container and funnel had been full, and therefore I assumed it had been full for longer than 3 days. The original NOPF stated that the facility failed to limit the amount of hazardous waste in the SAA to 55 gallons, as required by 40 CFR 262.34(c)(2) (**NOPF No. 2**). However, after further review of the regulations, this area is a less-than-270-day CSA and those regulations apply rather than the SAA regulations. The container was

not marked with the accumulation date, as required by 40 CFR 262.34(d)(4) referencing 262.34(a)(2) (**NOPF No. 3**) In discussions with Mr. Lehrter, he stated that filling a SAA container takes approximately 2 to 3 months. Therefore, I assumed that waste had not been in storage for longer than 270 days. I forwarded a copy of the revised NOPF to Mr. Lehrter via email on August 19, 2010 (see Attachment 6), and included in the email that NOPF No. 2 did not apply.

The last SAA I observed for this waste stream, SAA No. 7, was located in the Cement Building (see Attachment 8, Photograph 17). Small batches of adhesives and other specialty mixtures are prepared in this area and accumulated in a 55-gallon container. The container was in good condition, closed, properly marked, and near the point of generation. It held approximately 15 gallons of waste.

I also observed three 55-gallon containers of waste solvent with resin and adhesive in the primary CSA (see Section 4 below).

Supported rubber waste is generated from production of weather stripping that has metal or other rigid support material in it. The waste is either trimmings of finished product or off-specification product. Henniges has determined this material to be nonhazardous waste based on product knowledge. Currently, the facility generates approximately 100,000 pounds of this material a month. It is placed in various cardboard containers throughout the facility and sent to the Backridge Landfill in LaGrange, Missouri, for disposal.

Unsupported rubber waste is generated from production of weather stripping that does not have metal or other rigid support material in it. The waste is either trimmings of finished product or off-specification product. Henniges has determined this material to be nonhazardous waste based on product knowledge. Currently, the facility generates approximately 40,000 pounds of this material a month. It is placed in various cardboard containers throughout the facility and is collected by North Cedar Recycling – South of Keokuk, Iowa, for recycling.

Polycoating waste is generated from overspray during application of this coating on various weather stripping parts. Polycoating prevents parts from sticking together before they are cured. It is a paste-like material when a waste. Henniges has determined the polycoating waste to be nonhazardous based on the information in the MSDS (see Attachment 10). Henniges generates approximately 100 pounds of waste polycoat per month. Polycoating waste is placed in the general trash containers and sent to the Backridge Landfill in LaGrange, Missouri, for disposal.

Waste flammable liquids are generated from flushing various lines. Henniges has determined this waste stream to be hazardous waste (D001, F003, F005, and D022) based on the MSDSs of the solvents before use. Solvents included toluene, chloroform, pyridine, acetone, and methanol. The facility generates approximately 55 gallons of waste flammable liquids per 3 months. Waste flammable liquids are collected in a 55-gallon container in one SAA and in a 5-gallon container in another SAA. The containers are taken to the primary CSA when full. Waste flammable liquids are transported to Badger Disposal of Milwaukee, Wisconsin, for fuel blending. The most recent collection occurred on June 8, 2010 (see Attachment 9, page 1).

During the visual inspection, I observed two SAAs for this waste stream. One SAA, No. 6, was in the Cement Building (see Attachment 8, Photograph 18). The container was in good condition, closed, properly marked, and near the point of generation. It contained approximately 25 gallons. The other SAA was in the C170 Area (see Attachment 8, Photograph 19). The container was in good condition, closed, properly marked, and near the point of generation. It held approximately 3 gallons of waste.

Solvent rags are generated during the mixing operations that occur in the Cement Building. Solvent is put on the rag, and the rag is used to clean adhesive, resin, and waste paint. Henniges has determined the rags are hazardous waste (D001, F003, F005, and D022) based on the MSDSs of the solvents before use, including toluene, chloroform, pyridine, acetone, and methanol. The facility generates approximately 55 gallons of solvent rags per year. Solvent rags are accumulated in a SAA container. When the container is full, it is taken to the primary CSA, and then transported to Badger Disposal of Milwaukee, Wisconsin, for fuel blending.

During the visual inspection, I observed one SAA for this waste in the Cement Building (see Attachment 8, Photograph 20). The container was in good condition, closed, properly marked, and near the point of generation. It held approximately 15 gallons of waste.

Used oil is generated during facility maintenance of servicing hydraulic equipment and changing lubricating oils from other machinery. Used oil and absorbents are considered nonhazardous by the facility based on process and product knowledge. The facility generates approximately 700 to 1,000 pounds annually of used oil sludge and absorbents from cleaning spills in the mixing area, and 125 gallons per month of used oil from facility-wide maintenance processes. Containers of used oil sludge are stored in the primary CSA and Cement Building, and liquid used oil is stored in an AST in the

Indoor Tank Farm. Used oil is collected by Northland Services for recycling or reuse as a fuel (see Attachment 11). The most recent collection was in August 2009. The used oil sludge is transported to Badger Disposal of Milwaukee, Wisconsin, for fuel blending. The most recent collection was in December 2009 (see Attachment 12, page 1).

During the visual inspection, I observed a used oil AST with an approximately 5,000-gallon capacity (see Attachment 8, Photograph 21). The tank was in good condition, had secondary containment, was labeled as "used oil," and had a level gauge to prevent overfilling (see Attachment 8, Photographs 22 and 23). I also observed four 55-gallon storage containers in the main CSA that contained used oil sludge (see Attachment 8, Photograph 24); these containers were in good condition and properly marked (see Attachment 8, Photograph 25). In the Cement Building, I observed one container of used oil sludge (see Attachment 8, Photograph 26). This container was in good condition. Upon returning from the inspection, I noted that the container was marked with the words "oil sludge." The facility failed to label the container as "used oil," as required by 40 CFR 279.22(c)(1) (**NOPF No. 5**). The facility was notified of the additional NOPF.

Spent parts washer solvent is generated during facility maintenance. The facility considers the spent parts washer solvent (mineral spirits) characteristic (D001) hazardous waste based on product knowledge. It contains only petroleum distillates. The facility generates approximately 30 gallons per 8 weeks. Spent parts washer solvent is collected directly from the parts washer by Northland Services (Northland) of Waterloo, Iowa, and taken for recycling. Mr. Lehrter did not know when the parts washer solvent had been last collected. I obtained a copy of an example of the typical receipt from Northland (see Attachment 13).

During the visual inspection, Mr. Lehrter accompanied me to the facility maintenance areas, where I observed the facility's two parts washers (see Attachment 8, Photographs 27 and 28). According to Mr. Lehrter, the units are serviced by Northland every 8 weeks under a tolling agreement. Henniges does not manifest the shipment of the solvent, since a SQG may ship hazardous waste under a contractual agreement without a manifest (40 CFR 262.20). Northland immediately takes the container of spent parts washer solvent off site for recycling.

Used lamps are generated during facility maintenance. The facility considers used lamps characteristic (D009) hazardous waste and manages used lamps as universal waste. The facility generates approximately 500 lamps per year. According to Mr. Lehrter, used lamps were last collected for

recycling from this area on July 13, 2010. Waste lamps are transported by Veolia to Retrofit in Owatonna, Minnesota, for recycling.

During the visual inspection, Mr. Lehrter accompanied me to two locations where universal wastes are collected—the caged area in the manufacturing area and the building outside the manufacturing area identified as Universal Waste Area #3 (see Attachment 7). In the caged area (see Attachment 8, Photograph 29), I observed two cardboard containers of used lamps (see Attachment 8, Photographs 30, 31, and 32). I observed approximately 50 used lamps in both containers. Both containers were labeled as "universal waste lamps," and dated. One container, the fiber drum (see Attachment 8, Photograph 30) was closed. However, after further review, one of the cardboard containers in the caged area (see Attachment 8, Photograph 32) is not considered closed as required by 40 CFR 273.13(d)(1), because the lid is not taped shut (**NOPF No. 7**). I forwarded a copy of the revised NOPF to Mr. Lehrter via email on September 23, 2010 (see Attachment 6).

In the Universal Waste Area #3 (see Attachment 8, Photograph 33), I observed one container of universal waste lamps (see Attachment 8, Photographs 34 and 35). The container had approximately five lamps. The container was labeled as "universal waste lamps," and properly dated. However, after further review one of the containers in Universal Waste Area #3 (see Attachment 8, Photograph 35) is not considered closed as required by 40 CFR 273.13(d)(1), because the lid is not taped shut (**NOPF No. 7**). I forwarded a copy of the revised NOPF to Mr. Lehrter via email on September 20, 2010 (see Attachment 6).

Waste batteries are generated during facility maintenance. The facility generates spent alkaline, nickel-cadmium (NiCd), and lithium batteries as a characteristic (D006, D003) hazardous waste, and these are managed as universal waste. The facility generates approximately 100 pounds per year. Spent alkaline, NiCd, and lithium batteries are stored in containers in the caged area, although no containers were observed at the time of the inspection. Spent alkaline, NiCd, and lithium batteries are transported by Veolia to Retrofit in Owatonna, Minnesota, for recycling; the most recent collection was on July 13, 2010.

Waste ballasts are generated from maintenance of lighting fixtures throughout the facility and office areas. Henniges has determined the ballasts are nonhazardous waste based on product knowledge. Some of the older liquid-filled ballasts may contain polychlorinated biphenyls (PCB), but the new electronic ballasts do not have PCBs. Ballasts containing PCBs are regulated under the Toxic Substance Control Act and not RCRA. The spent ballasts are stored in a closed 5-gallon plastic container in the caged

storage area (see Attachment 8, Photograph 36). The waste ballasts are transported by Veolia to Retrofit in Owatonna, Minnesota, for recycling, and were last collected on July 13, 2010.

Waste mercury-containing devices are generated from maintenance of equipment within the facility. This waste stream includes mercury-containing switches and mercury lamps. Henniges has determined these devices are a hazardous waste based on product knowledge (D009), and manages this waste stream as a universal waste. Henniges stores this waste stream in the caged area in appropriate containers. I observed two containers of mercury-containing wastes in the caged area. They were in good condition, properly marked with the words "universal wastes mercury Vapor" and "universal wastes mercury lamps," and dated (see Attachment 8, Photograph 36). The waste mercury-containing devices are transported by Veolia to Retrofit in Owatonna, Minnesota, for recycling, and were last collected on July 13, 2010.

Spent lead-acid batteries are generated during maintenance of electric carts and lift trucks (see Attachment 8, Photograph 37). Henniges generates approximately five spent lead-acid batteries per year. Batteries from cart maintenance are taken to O'Reilly Auto Parts in Keokuk, Iowa, and batteries from lift maintenance are taken to M&H Equipment in Keokuk, Iowa, for recycling. They are, therefore, considered exempt from the definition of solid waste.

Electronic wastes are generated from removal of computers, monitors, and other electronic equipment. Henniges has determined this waste stream is hazardous based on product knowledge (D008). Henniges manages this waste stream as a universal waste. Mr. Lehrter said that Henniges generates about two gaylord boxes of electronic waste every 3 months on average, although he stated that the amount of this waste stream varies significantly, depending on changeout of equipment and monitors. No electronic waste was present at the time of the inspection. This waste stream is collected by North Cedar Recycling – South in Keokuk, Iowa, for recycling.

Waste paint is generated from maintenance activities at the facility. Henniges has determined the waste paint is a hazardous waste (D001), based in product knowledge, as it is oil-based paint. The waste paint is collected in a 55-gallon container in SAA No. 7 in the Cement Building (see Attachment 8, Photograph 38). The container was closed, in good condition, properly marked, and near the point of generation. It held approximately 30 gallons of waste paint. Henniges generates approximately 20 to 30 gallons of waste paint a year. The waste paint is sent to Badger Disposal in Milwaukee, Wisconsin, for disposal.

Scrap metal is generated during metal processing (pressing or cutting) and is nonhazardous waste. Because the scrap metal is recycled, the facility considers it exempt from the definition of solid waste and thus not a hazardous waste per 40 CFR Part 266 Subpart G. Mr. Lehrter was not aware of the amount of scrap metal generated at the facility. Scrap metal is stored in dumpsters throughout the facility (see Attachment 8, Photograph 39). The scrap metal is collected and recycled by North Cedar Recycling – South in Keokuk, Iowa.

Small compound waste is generated from floor sweepings from the blending of specialty additives for the rubber, such as clays and other inert materials, that occurs in this area. Henniges has determined this waste to be nonhazardous based on the MSDSs of the ingredients. Based on the materials stored in the small compound area, I concurred with Henniges's determination. The waste is collected in a 55-gallon container (see Attachment 8, Photograph 40). The facility generates approximately one 55-gallon container every 6 months. This is consolidated with the general trash and disposed of at the Backridge Landfill in LaGrange, Missouri.

General facility trash is generated from facility maintenance, cleaning, office trash, polycoating waste, and small compound waste. The facility considers the general facility trash nonhazardous based on process knowledge. The facility generates approximately 40 tons per month. Trash is collected by Browning Ferris and taken for landfilling at the Backridge Landfill in La Grange, Missouri.

4. Waste Storage Areas

Primary CSA

Mr. Lehrter accompanied me to the primary CSA, which is located in a caged enclosure in a building attached to the north side of the Cement Building (see Attachment 7). The last disposal date for hazardous wastes was June 8, 2010, as identified from a review of the facility manifests (see Attachment 9).

I observed three 55-gallon containers of hazardous waste—all contained waste solvent, resin, and adhesive and were all completely full (see Attachment 8, Photographs 41 through 44). All containers were closed, labeled, and dated. The oldest date on these containers was June 9, 2010.

In the CSA, I also observed four 55-gallon containers of nonhazardous wastes, all four of which contained used oil sludge (see Attachment 8, Photograph 24).

In the immediate vicinity of the CSA, I observed a spill kit and a telephone with the facility's emergency contact list and emergency procedures posted next to it; all the information required by 40 CFR 262.34(d)(5)(ii) was present. The entire building is served by an automatic sprinkler system. Mr. Lehrter stated that the area is inspected weekly, and my review of the inspection logs confirmed this statement.

228 Area CSA

The 228 area was considered a SAA by the facility but was inspected as a CSA. The container in the area held more than 55 gallons of waste (see Attachment 8, Photograph 16), and the excess waste had been in the area for more than 3 days. The container was closed, labeled, and in good condition (see Attachment 8, Photograph 15). However, it was not marked with its accumulation date, as required by 40 CFR 262.34(d)(4) referencing 262.34(a)(2) (**NOPF No. 3**). Based on discussions with Mr. Lehrter, it takes approximately 2 to 3 months to fill a SAA container; therefore, I assumed that waste had not been in storage for longer than 270 days.

The facility maintains a spill kit in the primary CSA. The building has a sprinkler system and phones nearby for emergency purposes. Mr. Lehrter stated that because this area is normally a SAA, it is not inspected by his staff on a weekly basis. The facility failed to inspect the storage area weekly as required by 40 CFR 262.34(d)(2) referencing reference 265.174 (**NOPF No. 4**).

NOPFs No. 3 and 4 were added after the CEI. I forwarded a copy of the revised NOPF to Mr. Lehrter via e-mail on August 19, 2010 (see Attachment 6).

SAA – No. 1 CSA (Oven Line 2 Area)

The Oven Line 2 Area was considered a SAA (SAA – No. 1) by the facility but was inspected as a CSA. The containers in the area held more than 55 gallons of waste (see Attachment 8, Photographs 6 through 8), and the excess waste had been in the area for more than 3 days. The containers were labeled and in good condition. However, they were not marked with their accumulation dates, as required by 40 CFR 262.34(d)(4) referencing 262.34(a)(2) (**NOPF No. 3**). The containers also were not closed, as required by 40 CFR 262.34(d)(2) referencing 265.173(a) (**NOPF No. 6**). Based on discussions with Mr. Lehrter, waste is removed from the area every 3 to 4 months; therefore, I assumed that waste had not been in storage for longer than 270 days.

The facility maintains a spill kit in the primary CSA. The building has a sprinkler system and phones nearby for emergency purposes. Mr. Lehrter stated that because they transfer waste from one container to another container in the area every week, it is inspected by his staff on a weekly basis.

NOPFs No. 3 and 6 were added after the CEI. I forwarded a copy of the revised NOPF to Mr. Lehrter via e-mail on August 19, 2010, and September 20, 2010 (see Attachment 6).

5. Additional Observations

I also observed a container of absorbent in the Mixing Area that is used to respond to releases of oil from the rubber manufacturing process (see Attachment 9, Photographs 45 and 46).

6. Manifests

I reviewed approximately 14 manifests generated by the facility since January 2007. All had LDR notices attached. I did not observe any deficiencies related to manifesting. Copies of the two recent manifests are included in Attachment 9. I also reviewed the shipping papers for the non-hazardous waste disposed of by the facility; those are included in Attachment 12.

7. Personnel Training Requirements

As a SQG, the facility is not required to maintain a formal training plan or job descriptions, although it must meet the training requirements outlined by 40 CFR 262.34(d)(5)(iii). This is required to ensure that employees are thoroughly familiar with proper waste handling procedures relevant to their responsibilities. As part of its environmental management system, Henniges conducts formal hazardous waste training and hazardous waste management procedures that are posted in hazardous waste management areas (see Attachment 8, Photograph 13). Mr. Lehrter stated he and Mr. Dennis Gates attend annual RCRA training off site. Mr. Gates is responsible for the CSA and movement of wastes from the SAAs to the CSA, and he signs most manifests. I did not observe any deficiencies related to personnel training.

8. Preparedness and Prevention, Contingency Plan, and Inspection Requirements

As a SQG, the facility is required to have made arrangements with local emergency agencies (40 CFR 262.34(d)(4)), to have an emergency coordinator on premises or on call (40 CFR 262.34(d)(5)(i)), and to have emergency contact information posted near phones (40 CFR 262.34(d)(5)(ii)). According to Mr. Lehrter, the facility has made arrangements with the

Keokuk fire department, Keokuk police department, the Howard County sheriff, and Regional Health Services (local hospital). The facility has identified Mr. Lehrter as the primary emergency coordinator (EC), with Messrs. Dennis Gates and Larry Lasater as secondary ECs. According to Mr. Lehrter, one of the ECs is on-call 24 hours per day. During my visual inspection, I observed a telephone in the CSA. Emergency contact information, including fire department information, and emergency procedures, including the location of response equipment, were posted next to the phone.

During my visual inspection of the primary CSA, I observed fire extinguishers, a nearby spill kit, and a telephone for summoning emergency assistance. According to Mr. Lehrter, the primary CSA is inspected once a week. The SAAs are inspected on a less frequent basis, usually approximately once a week, but Mr. Lehrter could not be certain that all SAAs are inspected every week. I reviewed the facility's inspection logs to confirm the inspections were being done on a weekly basis, items for inspection, and the notation for problems and resolutions. I did not observe any deficiencies.

9. Summary of Preliminary Findings

In summary, as part of the CEI, I made the following preliminary findings:

- Failure to close a SAA container in SAA Nos. 3, and 4, as required by 40 CFR 262.34(c)(1)(i) referencing 265.173(a), (**NOPF No. 1**).
- Failure to mark the containers in SAA No. 1 and in Area 228 SAA with the accumulation date, as required by 40 CFR 262.34(d)(4) referencing 262.34(a)(2) (**NOPF No. 3**).
- Failure to inspect the storage area in 228 Area weekly, as required by 40 CFR 262.34(d)(2) referencing reference 265.174 (**NOPF No. 4**).
- Failure to label the oil sludge waste in the Cement Building with the words "used oil," as required by 40 CFR 279.22(c)(1) (**NOPF No. 5**).
- Failure to close the cardboard container and 55-gallon steel container in SAA No. 1 Area, as required by 40 CFR 262.34(d)(2) referencing 265.173(a) (**NOPF No. 6**)
- Failure to maintain universal waste lamps in the caged area and Universal Waste Area No. 3 in a closed container, as required by 40 CFR 273.13(d)(1) (**NOPF No. 7**).

After the CEI, NOPF No. 2 was removed, and NOPFs Nos. 3 through 7 were added.

David H. Homer
Senior Environmental Scientist
Tetra Tech EM Inc.
Date: 1/27/10

Attachments:

1. Multimedia Screening Checklist (Two Pages)
2. RCRA Info Data Verification Handler Information Report (One Page)
3. Data Gathering Worksheets and Checklists (35 Pages)
4. Receipt For Documents And Samples (One Page)
5. Confidentiality Notice (One Page)
6. Notice of Preliminary Findings (Three Pages)
7. Facility Site Plan (One Page)
8. Photographic Documentation (27 Pages)
9. Hazardous Waste Manifests and Land Disposal Restriction Notifications (14 Pages)
10. Material Safety Data Sheet - Polycoat (Four Pages)
11. Used Oil Shipping Paper (One Page)
12. Non-hazardous Waste Manifests (Four Pages)
13. Parts Washer Solvent Invoice/Shipping Paper (One Page)

ATTACHMENT 1

MULTIMEDIA SCREENING CHECKLIST

(Two Pages)

Forward To: EJ ☐ EPCRA / RMP / TSCA ☒ CWA ☐ Wetlands ☐ UIC ☐ PWS ☐ CAA / CFC ☒ RCRA ☐ UST ☐ SPCC ☐

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: Hennigs Automotive Iowa Inc
Facility Ownership: Hennigs Automotive
Street: 3200 Main Street
City: Keokuk State: IA Zip: 52632
Phone: 319/524-4560 Facility Contact: Joe Lehnherr
Number of Employees: 450 full time Work Hours/Shifts 3 shifts 7a-3:30p 3p-11p 11p-7a
Main facility activity, major process chemical(s) & description: extrusion & molding - rubber

Inspector David Homer
Primary Media: RCRA
Inspector Phone Ext.: 816/412-1262
Date: 7/26/10
SIC/NAICS Code 326291
Facility Subject to OSHA regulations Yes ☒ No ☐

(**Check all that apply**): painting/coating (water-based ☒, solvent-based ☒), printing ☐, reacting ☐, formulating ☒, distilling ☐, water treatment ☒, refrigeration ☒, manufacturing ☒, parts washers/degreasing (water-based ☐, halogenated-based ☐, non-halogenated-based ☐), combustion (boiler, furnaces, oxidizers) ☐ plating (chrome ☐, other ☐).

ENVIRONMENTAL JUSTICE (Note: Forward to EJ if a concern is identified during your inspection)

1. Is the facility located in an apparent low income area (e.g., with many abandoned and dilapidated properties)? No ☒ (stop) Yes ☐
   If yes, is facility less then 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☐ (stop) Yes ☐ ***Forward to EJ***

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☒ No ☐ ***Forward to EPCRA***
2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☐ (stop) Yes ☒ ***Forward to EPCRA***
3. Has the facility: ***If any box in question 3 is marked - Forward to EPCRA***
   a. Stored ≥500 lbs of ammonia ☐, ≥100 lbs of chlorine ☐, or ≥10,000 lbs of an industrial chemical ☒, at any time over the last 2 years? ☐
   b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐
   c. Used ≥10,000 lbs of ammonia ☐, chlorine ☐, halogenated solvents ☐, solvent-based paints ☒, or solvents ☒, or nitrated compound, over the last calendar year? ☐
   d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☒
4. Does the facility have any oil filled electrical equipment No ☐ (stop) Yes ☒ ***Forward to TSCA and ask*** Has facility tested oil filled equipment to determine PCB content; No ☐ Yes ☒ number containing PCBs greater than 50 ppm 0 and percent of all equipment tested 100. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ – ***Get Photo***

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☒ (stop) Yes ☐
   If yes, are all wastewater discharges permitted? Yes ☐ No ☐ ***Forward to CWA***
2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☐ (stop) Yes ☒
   If yes, are the discharges permitted by: State? ☐, City? ☒ – If yes, Stop here. No ☐ ***Forward to CWA***
   If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ ***Forward to CWA***
3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☐ (stop) Yes ☒
   If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☒ No ☐ ***Forward to CWA***
4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: ☐ (***Get Photo***) ***Forward to CWA***
5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☒ (stop) Yes ☐
   If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years? No ☐ (stop) Yes ☐ - Identify location and timeframe ☐ (***Get Photo***) ***FWD to Wetlands***

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☒ (stop) Yes ☐ ***Forward to UIC***
   If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc)? No ☒ (stop) Yes ☐ ***Forward to PWS***
   If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA) and CFCs

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☒ Yes ☐ ***Forward to CAA***
   Source_____ ***(Get Photo)***
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☐ (stop) Yes ☒
   If yes, is equipment permitted? Yes ☒ No ☐ ***Forward to CAA*** *Describe:*_____
3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No ☐ (stop) Yes ☒ ***Forward to CFC***
   If yes, are these units: Self-serviced? ☒ Contract Serviced? ☒ - Service Company: Carrier AC Kuhuk IA
4. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia ? No ☒ (stop) Yes ☐ ***Forward to EPCRA/RMP***
5. Does the facility service motor vehicle air conditioning systems? No ☒ (stop) Yes ☐ ***Forward to CFC***

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☐ (stop) Yes ☒
   If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☒ (stop) No ☐ ***Forward to RCRA***
2. Is hazardous waste treated ☐ , stored >270 >90-days ☒, burned ☐ , land filled ☐ , put in surface impoundments ☐ or waste piles ☐ ?
   No ☒ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ ***Forward to RCRA***
3. Did you see or does the facility have any large quantities of materials **that the facility claims to be non-hazardous waste material** (>10 drums, roll-offs, waste piles, etc. – exclude clean office trash, cardboard, & packaging type wastes)? No ☒ (stop) Yes ☒

Material Claimed To Be Non-Hazardous	**How does the facility know these wastes are non-hazardous?**
Rubber Waste	Testing, industry or manuf. info.., MSDS, etc. ☒ ; None available ☐ ***Forward to RCRA***
Bag house dust	Testing, industry or manuf. info.., MSDS, etc. ☒ ; None available ☐ ***Forward to RCRA***
	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ ***Forward to RCRA***
	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ ***Forward to RCRA***
	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ ***Forward to RCRA***

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☒ Yes ☐ ***Forward to RCRA***
   Describe:_____ ***(Get Photo)***
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☒ Yes ☐ ***Forward to RCRA***
   Describe:_____ ***(Get Photo)***
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☒ Yes ☐ ***Forward to RCRA & EPCRA*** Describe:_____ ***(Get Photo)***
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☒ Yes ☐ ***Forward to UST***
8. Does the facility have any underground fuel tanks for emergency generators? No ☒ Yes ☐ ***Forward to UST***

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
   No ☐ (stop) Yes ☒ - Does the facility have a certified SPCC Plan? Yes ☒ No ☐ ***Forward to SPCC***
   If yes, are there secondary containment systems for the tanks? Yes ☐ No ☐ ***Forward to SPCC***
   If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☒ Yes ☐ ***(Get Photo) Forward to SPCC***

ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)

1. Does your facility have an EMS? No ☐ Yes ☒
2. Is the facility's EMS ISO 14001 certified? No ☐ Yes ☒

**** PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS***

ATTACHMENT 2

RCRA INFO DATA VERIFICATION HANDLER INFORMATION REPORT

(One Page)

HANDLER INFORMATION REPORT

January 22, 2010

Procedures for Inspectors/Investigators/etc. performing Site Visits

Present the Facility representative with a copy of their:

- Handler Information Report (attached)
- Copy of the current Notification Form (attached)
- Copy of the current Notification Booklet (attached)

Our instructions to them are printed on their Handler Information Report - and should be self explanatory. If the facility wants to revise their Handler Information Report, they can do so and mail it back to EPA - or have the inspector deliver it.

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to: Beth Koesterer, AWMD/RESP.

EPA RCRA ID Number: IAD005136023

Name of Company/Site: HENNIGES AUTOMOTIVE IOWA INC
Location of Site: 3200 MAIN ST
KEOKUK, IA 52632
LEE County

Land Type: Private

NAICS: 326291 - Rubber Product Manufacturing for Mechanical Use

Mailing Address: 3200 MAIN ST
KEOKUK, IA 52632

Site Contact: JOE P LEHRTER
Phone Number: 319-524-4560 283
Address: 3200 MAIN ST
KEOKUK, IA 52632
Email: JOE.LEHRTER@HENNIGESAUTOMOTIVE.COM

Current Owner of Site: HENNIGES AUTOMOTIVE
Owner Type: Private

Current Operator of Site: HENNIGES AUTOMOTIVE
Operator Type: Private

TYPE(S) OF REGULATED ACTIVITY: Federal Small Quantity Generator
Haz Waste Treater, Storer, Disposer, per EPA
Corrective Action
USED OIL GENERATOR SQH - UNIV. WASTE

Hazardous Wastes Handled: D001 F003 UOIL, ~~UNIVERSAL WASTE~~ D009, D006, D008
F005 D022

I 08/09/05 1 1st N 02/07/00 N 06/05/09 2

Certified by Notification on 06/05/09 by
SHAWN MC AFEE 05/31/09
GENERAL MANAGER

Date of Site Visit: July 20, 2010

Name of Inspector (Please print): David Hamer

(Check one): ☐ EPA R7 ENSV ☒ EPA R7 Contractor ☐ NOWCC/SEE Investigator

Signature of Inspector: David Hamer

ATTACHMENT 3

DATA GATHERING WORKSHEETS AND CHECKLISTS

(35 Pages)

Appendix 1-3

Facility: Henriques Automotive Date: 2/20/10 Arrival time: 8:40a

DRIVE-BY

1. Drive-by conducted from public right-of-way? ☒Yes ☐No

2. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):

see map -

3. Obvious concerns visible from public right-of-way (photos)? ☐Yes ☒No

- Containers	- Tanks	- Processing Equipment	- Loading Areas
- Unloading Areas	- Security Devices	- Open Drums	- Stressed Vegetation
-Unusual Staining	- Unusual Odors	- Obvious Discharges	- Improper Disposal
- Safety Concerns	- Other Concerns		

Appendix 1-4 SITE ENTRY AND INBRIEFING

1. ☒Used main entrance ☒Entered during normal operating hours ☐Excessive delays (>15 minutes - denial of access?) - ☒No

2. Facility Representative(s): Joe Lehrter Title: Sr. EHS Specialist

Title:

Title:

3. Does representative have intimate knowledge of all waste management practices? ☒Yes ☐No

How long in position? 2.5 yrs

4. Introduction:
- ☒Presented credentials
- ☒Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility
- ☒Verified presence at correct facility (checked address/I.D. #)
- ☒Explained authority to conduct inspection (Section 3007 of RCRA)
- ☒Explained the purpose, scope, and order of the inspection
- ☒Completed Multimedia screening checklist
- ☒Explained documentation process - worksheets, checklists, photos, notes, statements, etc
- ☒Provided SBRFA
- ☐Obtained GPS reading N/a
- ☒Explained facility's right to claim CBI

5. Was full access granted? ☒Yes ☒ By facility representative or Other (name): Joe Lehrter

☐No - Access denied. Name of person denying access:

Time of denial:

Reason for denial, or limitations placed on access:

Appendix 1-5 FACILITY BACKGROUND WORKSHEET

1. Site History:

Date facility began operating: 1906 Number of employees: 450 full time

Number of shifts/hour worked: 3 7-3 2-11 11-7 Number of days worked per week: 6 Mon-Saturday

Size (sq. ft., how divided): ~ 750,000 ft²

Property owner and facility operator the same? ☒Yes ☐No

Hennigs North American

2. Major products or services provided: rubber weatherstripping - automotive

3. Major raw materials used: polymers, carbon black, calcium carbonate solvents

4. Major manufacturing or processing operations which generate waste streams: (provide brief description)

Operation/Process	Waste Stream(s)
Mixing polymers/carbon black/CaCO3	Bag house dust
forming rubber products	Rubber Waste waste carbon black Waste rubber - supported - unsupported Solvent - resins / adhesives Waste flammable liquids poly coating small compound waste
Maintenance	Used oil Parts washer solvent Lamps Ballasts Batteries - NiCd Alk. Hg containing waste E-waste Solvent rags
General	General office trash
	Pb. acid batteries Scrap Metal Waste paint

5. Complete a Generator Waste Stream Worksheet and /or Off-Site Waste Stream Worksheet for the waste streams noted above and then finish this form.

6. Verified/compared above information with facility Notification Form: ☒Yes ☐No

7. **GENERATOR STATUS:** (based on records review)

☐Non-generator
☐CE (0-100kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1kg acute waste or 100 kg of acute spill residue)
☒SQG (100-1000kg/mo and accumulate<6000kg)
☐LQG (>1000kg/mo)

Is facility's status solidly within above category? ☒Yes ☐No
(If not carefully verify status and document)

8. **TSD STATUS:** NA ☐Treatment ☐Storage ☐Disposal

Note: Types of units, number of units, capacities, processes, etc:

9. Resolved questions from Pre-Inspection Worksheet? ☐Yes ☐No ☒No Questions

10. Resolved compliance officer's questions from Pre-Inspection Worksheet? ☐Yes ☐No ☒No Questions

11. Requested site map or diagram to identify all observations? ☒Yes ☐None Available

Appendix 1-6 Raw

GENERATOR WASTE STREAM WORKSHEET

1. WASTE STREAM: Rubber waste - ~~non-hazardous~~ DH.

FACILITY DETERMINATION: ☐Hazardous ☒Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: NA

DETERMINATION METHOD: ☒Product knowledge ☒Process knowledge ☐Testing

Documentation: ~~NA~~ DA MSDS of raw material

GENERATING PROCESS: excess from manufacturing process prior to extrusion

GENERATION RATE: 15,000 lb/month

ON-SITE MANAGEMENT: Satellites ☒Visually inspected Storage ☐Visually inspected

placed in containers onsite -

OFF-SITE MANAGEMENT/DISPOSITION: Picked up by North Cedar - South to Keokuk, IA for recycling

2. WASTE STREAM: Bag house Dust

FACILITY DETERMINATION: ☐Hazardous ☒Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: NA

DETERMINATION METHOD: ☒Product knowledge ☐Process knowledge ☐Testing

Documentation: Dust a mixture of Carbon black, $CaCO_3$, polymers - MSDS

GENERATING PROCESS: Air control devices from mix tables -

GENERATION RATE: 4 cubic yards / mon

ON-SITE MANAGEMENT: Satellites ☒Visually inspected Storage ☐Visually inspected

Waste collected in totes / bags located under the bag houses

OFF-SITE MANAGEMENT/DISPOSITION: Material sent to Backridge Landfill in LaCrange, MO for disposal

3. WASTE STREAM: Solvent - Resin / adhesives

FACILITY DETERMINATION: ☒Hazardous ☐Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: D001, ~~F003 F005~~ D022 DH

DETERMINATION METHOD: ☒Product knowledge ☐Process knowledge ☐Testing

Documentation: NA

GENERATING PROCESS: Solvents used to flush the lines and clean spray guns from the resins / glue lines solvent is either toluene, isopropanol, naphtha

GENERATION RATE: 250 gallon / 6 months

ON-SITE MANAGEMENT: Satellites ☒Visually inspected Storage ☐Visually inspected

managed in various SAAs throughout out plant. Consolidated in CSA.

OFF-SITE MANAGEMENT/DISPOSITION: Sent to Badger Disposal in Milwaukee WI for blended into fuel or incinerated

Appendix 1-6 GENERATOR WASTE STREAM WORKSHEET

4. WASTE STREAM: Rubber Waste - supported

FACILITY DETERMINATION: ☐Hazardous ☒Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: NA

DETERMINATION METHOD: ☒Product knowledge ☐Process knowledge ☐Testing

Documentation: NA

GENERATING PROCESS: Waste from manufacturing seals for doors/windows of cars has metal support in gasket/seal

GENERATION RATE: 100,000 lbs/month

ON-SITE MANAGEMENT: Satellites ☒Visually inspected Storage ☐Visually inspected facility

placed in containers/totes throughout the site - cardboard gaylord boxes

OFF-SITE MANAGEMENT/DISPOSITION: sent to Backridge Landfill, LaGrange, MO for disposal

5. WASTE STREAM: Rubber Waste - unsupported

FACILITY DETERMINATION: ☐Hazardous ☒Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: NA

DETERMINATION METHOD: ☒Product knowledge ☐Process knowledge ☐Testing

Documentation: NA

GENERATING PROCESS: Waste from manufacturing seals/gaskets for automotive doors/windows no metal support

GENERATION RATE: 40,000 lbs/month

ON-SITE MANAGEMENT: Satellites ☒Visually inspected Storage ☐Visually inspected

a side containers/totes throughout the facility - cardboard gaylord boxes.

OFF-SITE MANAGEMENT/DISPOSITION: Recycled - picked up by North Cedar-South Keokuk, IA.

6. WASTE STREAM: Polycoating

FACILITY DETERMINATION: ☐Hazardous ☒Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: NA

DETERMINATION METHOD: ☒Product knowledge ☐Process knowledge ☐Testing

Documentation: MSDS rubber

GENERATING PROCESS: Coating applied to make parts not stick to each other

GENERATION RATE: 100 lbs/month

ON-SITE MANAGEMENT: Satellites ☒Visually inspected Storage ☐Visually inspected

collected in containers from over spray

OFF-SITE MANAGEMENT/DISPOSITION: sent to Backridge Landfill for disposal with rubber waste

Appendix 1-6 GENERATOR WASTE STREAM WORKSHEET

1. WASTE STREAM: Used Oil and absorbents / sludges

FACILITY DETERMINATION: ☐Hazardous ☑Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: NA

DETERMINATION METHOD: ☐Product knowledge ☑Process knowledge ☐Testing

Documentation: NA

GENERATING PROCESS: Maintenance of equipment - gearboxes / hydraulics

GENERATION RATE: ~~35~~ 125 gallons / month of used oil & 700 to 1000 pounds of sludge absorbents. DH

ON-SITE MANAGEMENT: Satellites ☑Visually inspected Storage ☐Visually inspected

stored in a 5000 gallon tank in the main area for used oil, sludges are placed in 55 gallon containers.

OFF-SITE MANAGEMENT/DISPOSITION: waste oil picked up by Veolia for recycling or reuse.

2. WASTE STREAM: Waste flammable liquids

FACILITY DETERMINATION: ☒Hazardous ☐Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: D001, F003, F005, D022

DETERMINATION METHOD: ☑Product knowledge ☐Process knowledge ☐Testing

Documentation: NA

GENERATING PROCESS: cleaning of lines - toluene, chloroform acetone, pyridine & methanol

GENERATION RATE: 55 gallon / 3 months

ON-SITE MANAGEMENT: Satellites ☑Visually inspected Storage ☐Visually inspected

waste collected in SAA throughout facility & then consolidated in CSA. Use 55 gallon or 5 gallon containers both SAA & 55 gallon in CSA.

OFF-SITE MANAGEMENT/DISPOSITION: Waste sent to Badger Disposal of Milwaukee WI for reclamation or fuel blending

3. WASTE STREAM: Parts washer

FACILITY DETERMINATION: ☒Hazardous ☐Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: D001

DETERMINATION METHOD: ☒Product knowledge ☐Process knowledge ☐Testing

Documentation: NA petroleum distillates

GENERATING PROCESS: Maintenance machinery

GENERATION RATE: 40 gallons / 8 wks DH

ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☐Visually inspected NA

Waste removed directly from parts washer by Northland Services under a tolling agreement - no spent solvents stored during operation

OFF-SITE MANAGEMENT/DISPOSITION: Northland Services of Waterloo, IA services parts washers and removes spent solvent off site ~~for~~ DH for reclamation or reuse as a fuel ; facility unsure

Appendix 1-6 GENERATOR WASTE STREAM WORKSHEET

10/1. WASTE STREAM: Waste Lamps

FACILITY DETERMINATION: ☑Hazardous ☐Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: D009

DETERMINATION METHOD: ☑Product knowledge ☐Process knowledge ☐Testing

Documentation: NA

GENERATING PROCESS: General maintenance activities

GENERATION RATE: 20 boxes of bulbs/yr ~ 500 bulbs

ON-SITE MANAGEMENT: Satellites ☒Visually inspected Storage ☐Visually inspected

stored in specific universal waste cage in boxes

OFF-SITE MANAGEMENT/DISPOSITION: Waste transported by Veolia to Retrofit in Owatonna, MN for recycling

11 2. WASTE STREAM: Waste Batteries

FACILITY DETERMINATION: ☒Hazardous ☐Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: D006, D008

DETERMINATION METHOD: ☒Product knowledge ☐Process knowledge ☐Testing

Documentation: NA

GENERATING PROCESS: Spent Ni-Cd, alkaline & lithium batteries

GENERATION RATE: 2-3 5 gallon pails/year ~ 100 lbs

ON-SITE MANAGEMENT: Satellites ☒Visually inspected Storage ☐Visually inspected

stored in specific universal waste cage in buckets - no buckets present at the time of the inspection -

OFF-SITE MANAGEMENT/DISPOSITION: Waste transported by Veolia to Retrofit in Owatonna, MN for recycling

13. WASTE STREAM: Work Ballasts

FACILITY DETERMINATION: ☐Hazardous ☒Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: NA

DETERMINATION METHOD: ☑Product knowledge ☐Process knowledge ☐Testing

Documentation: NA

GENERATING PROCESS: Maintenance of light fixtures

GENERATION RATE: 3 gallon bucket/year

ON-SITE MANAGEMENT: Satellites ☑Visually inspected Storage ☐Visually inspected

Stored in specific universal waste cage in buckets

OFF-SITE MANAGEMENT/DISPOSITION: Waste transported by Veolia to Retrofit in Owatonna, MN for recycling

Appendix 1-6 GENERATOR WASTE STREAM WORKSHEET

13 1. WASTE STREAM: Waste Hg - Containing materials

FACILITY DETERMINATION: ☒Hazardous ☐Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: D009

DETERMINATION METHOD: ☒Product knowledge ☐Process knowledge ☐Testing

Documentation: NA

GENERATING PROCESS: Maintenance activities

GENERATION RATE: 5 3 ~~4~~ lbs / year

ON-SITE MANAGEMENT: Satellites ☒Visually inspected Storage ☐Visually inspected

Universal waste cage - stored in bucket

OFF-SITE MANAGEMENT/DISPOSITION: Waste transported by Veolia to Peterbilt in Owatana, MN for recycling

14 2. WASTE STREAM: E-Waste

FACILITY DETERMINATION: ☒Hazardous ☐Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: D008

DETERMINATION METHOD: ☒Product knowledge ☐Process knowledge ☐Testing

Documentation: NA

GENERATING PROCESS: Excess equipment & upgrading equipment

GENERATION RATE: 2 gaylord boxes / 3 months

ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☐Visually inspected

~~Placed in universal waste cage in gaylord boxes, Picked up by North Cedar - South Recycling. DK~~

OFF-SITE MANAGEMENT/DISPOSITION: E-waste picked up by North Cedar - South for recycling

15 3. WASTE STREAM: General Trash

FACILITY DETERMINATION: ☐Hazardous ☒Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: NA

DETERMINATION METHOD: ☒Product knowledge ☐Process knowledge ☐Testing

Documentation: NA

GENERATING PROCESS: general operations and maintenance

GENERATION RATE: ~~unknown~~

ON-SITE MANAGEMENT: Satellites ☒Visually inspected Storage ☐Visually inspected

roll off boxes and dumpsters

OFF-SITE MANAGEMENT/DISPOSITION: General trash taken to ~~Brooklyn~~ Blacktop Landfill, LaCrosse MO for disposal

Appendix 1-6 GENERATOR WASTE STREAM WORKSHEET

16. **WASTE STREAM:** Lead Acid Batteries

FACILITY DETERMINATION: ☐Hazardous ☑Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: NA

DETERMINATION METHOD: ☑Product knowledge ☐Process knowledge ☐Testing

Documentation: Returned to supplier - Interstate Batteries / M&H Supply receipt

GENERATING PROCESS: Maintenance of electric carts & lift trucks -

GENERATION RATE: ~5/year

ON-SITE MANAGEMENT: Satellites ☒Visually inspected Storage ☐Visually inspected

pallet in sod carts

OFF-SITE MANAGEMENT/DISPOSITION: returned to Interstate Batteries or M&H Equipment Kasket for recycling

17. **WASTE STREAM:** Scrap Metal

FACILITY DETERMINATION: ☐Hazardous ☒Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: NA

DETERMINATION METHOD: ☑Product knowledge ☐Process knowledge ☐Testing

Documentation: NA

GENERATING PROCESS: Excess from the manufacturing of support/weather stripping

GENERATION RATE: unknown

ON-SITE MANAGEMENT: Satellites ☒Visually inspected Storage ☐Visually inspected

collected in small dumpsters throughout the facility

OFF-SITE MANAGEMENT/DISPOSITION: recycled by North Cedar - South Recycling of Keokuk, IA

18. **WASTE STREAM:** Waste Paint

FACILITY DETERMINATION: ☒Hazardous ☐Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: D001

DETERMINATION METHOD: ☑Product knowledge ☐Process knowledge ☐Testing

Documentation: MSDS

GENERATING PROCESS: Maintenance activities / waste paint from application & washout skippy

GENERATION RATE: 55 gallon/year

ON-SITE MANAGEMENT: Satellites ☒Visually inspected Storage ☐Visually inspected

55A in Cement Building 55 gallon container

OFF-SITE MANAGEMENT/DISPOSITION: Sent to Badger Disposal for fuel blending or incineration

Appendix 1-6 GENERATOR WASTE STREAM WORKSHEET

19. WASTE STREAM: Waste Carbon Blocks

FACILITY DETERMINATION: ☐Hazardous ☒Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: NA

DETERMINATION METHOD: ☒Product knowledge ☐Process knowledge ☐Testing

Documentation: NA

GENERATING PROCESS: Floor sweepings of spills during transfer for various

GENERATION RATE: 55 gallon/month

ON-SITE MANAGEMENT: Satellites ☒Visually inspected Storage ☐Visually inspected

placed in 55 gallon steel containers

OFF-SITE MANAGEMENT/DISPOSITION: sent to Backridge Landfill in LaGrange MO for disposal

20. WASTE STREAM: Solvent Rags

FACILITY DETERMINATION: ☒Hazardous ☐Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: D001, F003, F005, D022

DETERMINATION METHOD: ☒Product knowledge ☐Process knowledge ☐Testing

Documentation: Rags are disposed in solvent and the used to clean resin cure adhesive, waste paint, other materials

GENERATION RATE: 55 gallons/year

ON-SITE MANAGEMENT: Satellites ☒Visually inspected Storage ☐Visually inspected

SAA with rags in Cement Buddy

OFF-SITE MANAGEMENT/DISPOSITION: Rags sent to Badger Disposal for incineration.

21. WASTE STREAM: Small Compound Waste

FACILITY DETERMINATION: ☐Hazardous ☒Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: NA

DETERMINATION METHOD: ☒Product knowledge ☐Process knowledge ☐Testing

Documentation: MSDS of materials stored in area

GENERATING PROCESS: Floor sweepings from formulation of specialty compounds

GENERATION RATE: 55 gallon/year

ON-SITE MANAGEMENT: Satellites ☒Visually inspected Storage ☐Visually inspected

stored in 55-gallon containers - steel.

OFF-SITE MANAGEMENT/DISPOSITION: sent off site for disposal at Backridge Landfill

DH

Appendix 1-8 RECORDS REVIEW WORKSHEET AND CHECKLIST

A. MANIFESTS

#	√ / x	REGULATORY REQUIREMENTS	MANIFEST #'S AND COMMENTS
1.	✓	Facility uses manifest system-262.20(a)(1)	
2.	✓	Manifests maintained for 3 years-262.40(a)	
3.	✓	Generator EPA I.D. number-262.20(a)	
4.	✓	Generator name, address, phone number-262.20(a)	
5.	✓	Transporter(s) name & EPA I.D. number-262.20(a)	
6.	✓	Designate facility name, address & EPA I.D. number-262.20(a)	
7.	NA	Alternate facility designated (optional)-262.20(c)	
8.	✓	Unique pre-printed manifest tracking number and number of pages-262.20(a)	
9.	✓	DOT shipping name, hazard class, waste code, & RQ (if required-49 CFR 172)-262.20(a)	
10.	✓	Containers: numbers, type, quantity, unit wt/vol.-262.20(a)	
11.	✓	Proper certification including waste minimization-262.20(a)	
12.	✓	Signed and dated-262.23(a)	
13.	NA	Exception report submitted if necessary-262.42	
14.	NA	Waste reclaimed under contractual agreement (SQG only)-262.20(e)(1)	
15.	✓	Generator maintains copy of contractual agreement for at least 3 years after termination or expiration of the agreement (SQG only)-262.20(e)(2)	
16.	✓	LDR notification/certification sent with manifests on 1st shipment-268.7(a)(2)	
17.	✓	LDR notification/certification includes: manifest number, correct EPA waste codes & treatment standards, and waste analysis data-268.7(a)(2)	
18.	✓	LDR notification/certification/waste analysis data & other documents maintained for 3 years-268.7(a)(8)	
19.	NA	Biennial Reports submitted per 262.41 (LQG only)	

√ - in compliance X – not in compliance N/A – not applicable

20. Approximate number of manifests generated since last inspection, or over past 3 years: 14

21. Approximate number of manifests reviewed: 14

22. Copies of manifests made ~~with regulatory violations?~~ ☑ YES ☐ NO

no violation noted copied most recent manifested

23. Additional requirements for *off-site* generated manifests:

#	√ / x	ADDITIONAL I.S./PERMIT* REGULATORY REQUIREMENTS	MANIFEST #'S AND COMMENTS
a.	DK	Manifests signed and dated-265.71(a)(2)(i)	
b.	NA	Manifest discrepancies noted and corrected w/in 15 days-265.71(a)(2)(ii)	
c.		Copy immediately given to transporter-265.71(a)(2)(iii)	
d.		Copy sent to generator w/in 30 days-265.71(a)(2)(iv)	
e.		Manifests retained for 3 years-265.71(a)(2)(v)	
f.		LDR notification/certifications retained for 3 years-268.7(e)(2)	
g.		Biennial Reports submitted per 265.75	

√ - in compliance X – not in compliance N/A – not applicable * - please not applicable permit requirement

h. Approximate number of manifests generated since last inspection, or over past 3 years:_____

i. Approximate number of manifests reviewed:_____

j. Copies of manifests made with regulatory violations? ☐ YES ☐ NO

B. PREPAREDNESS AND PREVENTION

#	√ / x	REGULATORY REQUIREMENTS	COMMENTS
1.	✓	Arrangements with local emergency agencies made-262.34(d)(4)→265.37 [SQG] or 262.34(a)(4)→265.37 [LQG, I.S.]	
2.	✓	Emergency coordinator on premises or on call-262.34(d)(5)(i) [SQG] or 262.34(a)(4)→265.55 [LQG, I.S.]	– 4 people listed
3.	✓	Emergency coordinator's name and phone number, fire department's phone number, and the location of fire extinguishers and spill control equipment posted near the phone [SQG only]-262.34(d)(5)(ii)	

√ - in compliance X – not in compliance N/A – not applicable

DK

D. PERSONNEL TRAINING

(SQG – 262.34(d)(5)(iii), LQG's – 262.34(a)(4) referencing 265.16, I.S.-265.16 only)

#	√ / x	REGULATORY REQUIREMENTS*	COMMENTS
1.	NA	Program director trained in hazardous waste management procedures (LQG only)→265.16(a)(2)	
2.		Employees do not work unsupervised without completing training & are trained within 6 mo. of initial hiring (LQG only)→265.16(b)	
3.		Employees are trained annually (LQG only)→265.16(c)	
4.		Job title & name of person filling position specified (LQG only)→265.16(d)(1)	
5.		Written job description including: skills, education or qualification, and duties (LQG only)→265.16(d)(2)	
6.		Written description of type and amount of introductory & continuing training provided (LQG only)→265.16(d)(3)	
7.		Training covers: response to emergencies, implementation of contingency plan, use of alarms, waste feed cut-offs & other emergency equipment, as required (LQG only)→265.16(a)(3)	
8.		Documentation confirming training has been completed (LQG only)→265.16(d)(4)	
9.	√	Records maintained on-site for current employees & for 3 years for former employees→265.16(d) & (e) respectively	
10.	√	All employees are familiar with waste handling and emergency procedures relevant to their responsibilities (SQG only)→262.34(d)(5)(iii)	

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

11. Notes/Observations:_____

E. WASTE ANALYSIS/WASTE DETERMINATION AND LAND DISPOSAL RESTRICTIONS

1. Location of waste analysis/waste determination records: at the plant

2. Person responsible for waste analysis/waste determination: Joe Lehrter

#	√/ x	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Determines if waste is a hazardous waste-262.11	
4.	✓	Determines if waste is restricted from land disposal-262.11(d)→268.7(a)(1)	
5.	✓	Determines waste does not meet applicable treatment standards (ATS)-268.7(a)(2)	
a.	✓	One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file-268.7(a)(2)	
b.	NA	SQG disposes of waste under a contractual or tolling agreement-268.7(a)(10). (LDR Notice available for the initial shipment and copy of LDR Notice kept for 3 years after termination of agreement)	
6.	NA	Waste covered by a National Capacity Variance(s)-268 Subpart C, Extension, or Petition-268.5 & 6. (Describe the variance, extension, or petition that applies)	
a.		Provides a notice to the land disposal facility with the initial shipment, or a revised notice if changes occur, stating that the waste is exempt from the LDRs-268.7(a)(4).	
7.	✓	Ships waste(s) covered by the LDRs off-site for treatment or disposal-268.7(a)(2). If no, go to 8.	
a.	✓	Provides a notice with initial shipment, or new notification, if changes occur-268.7(a)(2)	
b.	✓	Notice includes: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or non-wastewater classification, and subcategory, if applicable-268.7(a)(2)→268.7(a)(4)	
8.	NA	Determined waste to be excluded from the definition of hazardous or solid waste, or exempt from Subtitle C regulations under 261.2 thru 261.6 subsequent to the point of generation-268.7(a)(7)	
a.	↓	Retains a one-time notice describing the generation, subsequent exclusion or exemption, and the disposition of the waste, in the facility's on-site files-268.7(a)(7). (If soil contaminated with waste, a special certification statement is included with the notice-268.7(a)(2)(i))	
9.	NA	Determines waste or soil contaminated with waste does meet the ATS or does not exceed prohibition levels and requires no further treatment-268.7(a)(3)	
a.	↓	One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file-268.7(a)(3)(i)	
10.	NA	Additional special rules regarding waste that exhibits a characteristic-268.9	

a.		If not D001 non-wastewater, determines the underlying constituents as defined in 268.2(i)-268.9(a)	
b.		If land disposed, waste meets the treatment standards specified in 268 Subpart D-268.9(c)	
c.		First claims that their characteristic waste is no longer hazardous-sends a one-time notification and certification to EPA or authorized State, places a copy in the file, and updates both if there are changes in process, operation or receiving facility-268.9(d)	
11.	√	Impermissible dilution of waste to meet LDR standards in not occurring-268.3(a) & (b)	
12.	NA	If hazardous waste prohibited from land disposal is either: a contaminated soil, or is a contaminated soil which is treated, or a lab pack waste, or hazardous waste debris, or managed at a treatment or disposal facility, or the generator's determination is based solely on knowledge – See additional LDR checklists in Appendix 2-1	
13.	NA	References to Waste Specific Prohibitions under Subpart C: - Wood Preserving Wastes – 268.30 - Dioxin-containing Wastes – 268.31 - TC Metal Wastes – 268.34 - Petroleum Refining Wastes – 268.35 - Ignitable and Corrosive Characteristic Wastes Whose Treatment Standards Were Vacated – 268.37 - Newly Identified Organic Toxicity Characteristic Wastes and Newly Listed Coke By-Product and Chlorotoluene Production Wastes – 268.38 - Spent Aluminum Pot Liners; Reactive; and Carbamate Wastes – 268.39	
14.	NA	Prohibition on Storage of Restricted Waste-268.50	
15.	✓	Reminder – Treatment Standards listed in 268.41 through 268.49	

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

16. Notes/Observations:

J. USED OIL – RCRA INSPECTION CHECKLIST

1. What Used Oil activities does the facility engage in? Generates used oil from equipment maintenance

a. Type of used oil generated? Variety of oils - includes mineral oil
b. Amount of used oil generated? ~~1000~~ 1500 gallons/yr.

40 CFR 279.12 Prohibition Questions

1. Is used oil being managed only in a surface impoundment or waste pile subject to regulation under 40 CFR Parts 264 or 265? ☐ Yes ☐ No ☒ Not Applicable (NA)

2. Is used oil being used as a dust suppressant? ☐ Yes ☒ No

3. Is off-specification oil fuel burned for energy recovery in only industrial furnaces, industrial boilers, utility boilers, used oil-fired space heaters, or hazardous waste incinerators identified in 40 CFR Part 279.12 (c)(1-3)? ☐ Yes ☐ No Do not make that determination

Subpart C – Standards for Used Oil Generators

(Check here ☐ if this section is NA)

Instructions: *Fill out this section if the facility generates used oil or if facility activities first caused the used oil to become subject to regulation (see definition and applicability of used oil generator in 40 CFR 279.20). Used oil generators are subject to all applicable Spill Prevention, Control and Countermeasures (SPCC) requirements (40 CFR Part 112) and underground storage tank standards (40 CFR Part 280) in addition to the requirements of Subpart C.*

Regulation and Standard		*Violations*
279.21 Hazardous Waste Mixing		
1. Is the generator mixing hazardous waste with used oil?	☐ Yes ☒ No ☐ NA	
If yes, is the generator of a used oil containing greater than 1,000 parts per million (ppm) total halogens managing the used oil as a hazardous waste unless the used oil presumption is rebutted?	☐ Yes ☐ No ☒ NA	
2. Are analytical data available?	☐ Yes ☐ No ☒ NA	
279.22 Used Oil Storage		
1. Does the generator only store used oil in tanks, containers, or units subject to regulation under 40 CFR Parts 264 or 265?	☒ Yes ☒ No ☐ NA DH	
2. Are containers and aboveground tanks used by a generator to store used oil in good condition, with no visible leaks?	☒ Yes ☐ No ☐ NA	
3. Are containers, aboveground tanks, and fill pipes used for underground tanks labeled or marked "Used Oil"?	☒ Yes ☒ No ☐ NA DH	Oil sludge container not labeled
4. Upon detection of a release of used oil, has the generator		
a. Stopped the release?	☐ Yes ☐ No ☒ NA	
b. Contained the release?	☐ Yes ☐ No ☒ NA	
c. Cleaned up and managed the used oil and other materials?	☐ Yes ☐ No ☒ NA	
d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	☐ Yes ☐ No ☒ NA	
279.23 Used Oil Storage		
1. Is the generator burning used oil in used oil fired space heaters only when		
a. The heater burns only used oil that the owner or operator generates or used oil received from household do-it-yourself generators?	☐ Yes ☐ No ☒ NA	
b. The heater is designed to have a maximum capacity of not more than 0.5 million British Thermal Units per hour?	☐ Yes ☐ No ☒ NA	
c. The combustion gasses from the heater are vented to ambient air?	☐ Yes ☐ No ☒ NA	

DH

Regulation and Standard		*Violations*
279.24 Off-Site Shipment		
1. Has the generator ensured that the used oil is hauled only by a transporter that has obtained a U.S. Environmental Protection Agency (EPA) identification (ID) number?	☒ Yes ☐ No ☐ NA	
2. Does the generator have a tolling arrangement with a transporter without an EPA ID number?	☐ Yes ☒ No ☐ NA	
If yes, answer the three following questions. If no, move to question 6.		
3. Is the used oil reclaimed and returned by the processor or re-refiner to the generator for use as a lubricant, cutting oil, or coolant?	☐ Yes ☒ No ☒ NA DH	
4. Does the tolling contract indicate the type of used oil and the frequency of shipment?	☐ Yes ☐ No ☒ NA	
5. Is the vehicle used to transport the used oil to the processing or re-refining facility and to deliver recycled used oil back to the generator owned and operated by the used oil processor or re-refiner?	☒ Yes ☐ No ☒ NA DH	
6. Does the generator transport used oil generated at the generator's site or used oil collected from household do-it-yourselfers to a used oil collection center or to aggregation points owned by the generator?	☐ Yes ☒ No ☐ NA	

Regulation and Standard		*Violations*
7. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?	☐ Yes ☒ No ☒ NA DH	
8. Does the generator transport no more than 55 gallons of used oil at any time?	☐ Yes ☐ No ☒ NA	
9. Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil?	☐ Yes ☐ No ☒ NA	

For further Used Oil questions refer to Appendix 2-4:

Subpart D – Standards for Used Oil Collection Centers and Aggregation Points
Subpart E – Standards for Used Oil Transporters and Transfer Centers
Subpart F – Standards for Used Oil Processors and Re-Refiners
Subpart G – Standards for Used Oil Burners Who Burn Off-Specification Used Oil for Energy Recovery
Subpart H – Standards for Used Oil Fuel Marketers

K. Universal Waste (UW)

1. Universal Waste Generated

Waste:	Fluorescent & HID Lamps	Batteries	Hg-containing equip. and/or thermostats	Pesticides
Qty. Generate/year:	500	100 lbs	5 lbs	NA
Qty. Presently in storage:	20	0	0	
Accumulation Time:	1 month	—	✓	
Present Disposal Method:	recycle	recycle	recycle	

All materials sent to Retrolit

2. Person(s) responsible for universal waste management: Joe Lehrter

3. Does the universal waste handler accumulate (collectively) 5,000 kilograms or more at any time (40 CFR 273.9)? **If YES**, a large quantity handler (LQH), go on and also refer to checklist in Appendix 2-2. **If NO**, a small quantity handler (SQH), go on.

Assessing Requirements Common to *Universal Waste SQH & LQH* (40 CFR 273 Subpart B & C, respectively):

#	√ / x	REGULATORY REQUIREMENTS*	COMMENTS
1.	✓	Disposal of UW is not occurring-273.11(a)/273.31(a)	
2.	✓	Diluting or treating universal waste is not occurring, except for responding to releases per 273.17 or by managing specific wastes per 273.13 (waste management)-273.11(b)/273.31(b)	
3.	NA	Has the LQG notified of UW management?-273.32 (a)(1) (not required for SQH)	
4.	✓	Has UW been shipped to another UW handler, a designated facility, or a foreign destination?-273.18(a)/273.38(a) If not, see Appendix 2-2 for off-site shipments	
a.	NA	Does LQH have documentation tracking shipments?-273.39 (not required for SQH-273.19)	
5.		UW package, container, tank, vessel or transport vehicle is marked or labeled-273.14/273.34-as follows:	
a.	✓	"Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"-273.14(a)/273.34(a)	
b.	NA	For recalled universal waste pesticides; "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)," and the label that was on or accompanied the product as sold or distributed, or if the label is not available or not feasible to use, the appropriate DOT label as identified in 49 CFR 172-273.14(b)/273.34(b)	
c.	NA	For unused pesticide products as described in 40 CFR 273.3(a)(2): (1) the label that was on the product when purchased, if still legible; (2) if using that label is not feasible, the appropriate label required under DOT regulation 49 CFR Part 172; (3) if using either of the previously described labels is not feasible, another label prescribed or designated by the waste pesticide collection program administered or recognized by a state; **and** (4) the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"-273.14(c)/273.34(c)	
d.	✓	"Universal Waste-Mercury Containing Equipment," or "Waste Mercury-Containing Equipment," or "Used Mercury-Containing Equipment"-273.14(d)(1)/273.34(d)(1) Thermostats may be labeled: "Universal Waste-Mercury Thermostat(s)," or "Waste Mercury Thermostat(s)," or "Used Mercury Thermostat(s)"-273.14(d)(2)/273.34(d)(2)	
e.	✓	"Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)"-273.14(e)/273.34(e)	

6.	✓	Accumulation Time Limits – 273.15/273.35 A UW handler may accumulate universal waste **no longer than a year** from the date of generation or receipt from another handler, unless the requirements of paragraph 273.15(b) are met, as follows:	
a.	NA	Storage over one year is solely for the purpose of accumulation of such quantities as necessary to facilitate proper recovery, treatment, or disposal and the handler provides proof of this – 273.15(b)/273.35(b) For further requirements of UW retention time documentation, see Appendix 2-2.	
7.	✓	Employee Training – 273.16/273.36 The UW handler must inform all employees who handle or have responsibility for managing universal waste of the proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.	
8.	NA	Response to Releases – 273.17/273.37 – Did you observe any releases or did any releases occur? – if yes, see Appendix 2-2.	
9.	NA	Handlers of universal waste that self-transport universal waste off-site become a universal waste transporter for those self-transportation activities and must comply with the transporter requirements of subpart D of this part while transporting the universal waste – 273.18(b)/273.38(b) – and see Appendix 2-2.	

Appendix 1-9 VISUAL REVIEW WORKSHEET AND CHECKLIST

A. CONTAINER STORAGE AREA Behind Cement Building

(Complete one form per storage area)

1. Type of storage area: ☐<90 day ☐<180 day ☒<270 day ☐I.S. ☐Permit

2. I.S./Permitted capacity: NA

#	√ / x	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Date of accumulation marked and visible-262.34(a)(2)	
4.	✓	Containers marked as "Hazardous Waste"-262.34(a)(3)	
5.	✓	Containers in good condition-262.34(a)(1)(i)→265.171	
6.	✓	Containers are compatible with waste-262.34(a)(1)(i)→265.172	
7.	✓	Containers kept closed-262.34(a)(1)(i)→265.173(a)	
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34(a)(1)(i)→265.173(b)	
9.	NA	Containers storing incompatibles separated or protected from each other-262.34(a)(1)(i)→265.177	
10.	✓	Containers of ignitable/reactive waste stored >50 feet from property line [LQGs, I.S. & Permit, only]-262.34(a)(1)(i)→265.176	
11.	✓	Adequate aisle space for type of container management and emergency equipment used-262.34(a)(4)→265.35	
12.	✓	Container stored for less than 90/180/270 days, as applicable-262.34	
13.	✓	Storage area inspected weekly-262.34(a)(1)(i)→265.174	
		ADDITIONAL I.S. REQUIREMENTS*	
14.	NA	Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.		"No Smoking" signs conspicuously posted-265.17(a)	
17.		Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.	✓	Daily inspections of loading/unloading areas (when in use)-265.15(a)(4)	
		PRE-TRANSPORT REQUIREMENTS*	
20.	NA	Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.	✓	Placards available for use by transporters when applicable-262.33	

#	√ / x	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-262.34(a)(4)→265.34	
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.) - 262.34(a)(4)→265.32(c)	
24.	✓	Adequate water supply for fire control equipment-262.34(a)(4)→265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-262.34(a)(4)→265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-262.34(a)(4)→265.31	

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

27. Container inventory: ☒ Actual Count ☐ Approximate count

Waste Type	Container Size	Total
Solvent & Resin	1 x55 gal. ___ x 30 gal. 55	55
~~Waste Flammable Liquids~~	~~1 x55 gal. ___ x 30 gal. 55~~	~~55~~
Solvent & Resin	1 x55 gal. ___ x 30 gal. 55	55
Solvent & Resin	1 x55 gal. ___ x 30 gal. 55	55
	___x55 gal. ___x 30 gal.	
	___x55 gal. ___x 30 gal.	
	___x55 gal. ___x 30 gal.	165

Total Quantity (pounds, gallons, etc.): ~~1515~~ 165 gallons DL

28. How were container volumes verified? tapping containers

29. Photos taken to verify observations: ☒ YES ☐ NO Numbers: 4 Photolog #41-44

30. Container management area location noted on map or diagram: ☒ YES ☐ NO

31. Notes/Observations:

Appendix 1-9 VISUAL REVIEW WORKSHEET AND CHECKLIST

A. CONTAINER STORAGE AREA

Z28 Area

(Complete one form per storage area)

1. Type of storage area: ☐ <90 day ☐ <180 day ☒ <270 day ☐ I.S. ☐ Permit

2. I.S./Permitted capacity: NA

#	√/x	REGULATORY REQUIREMENTS*	COMMENTS
3.	X	Date of accumulation marked and visible-262.34(a)(2)	
4.	✓	Containers marked as "Hazardous Waste"-262.34(a)(3)	
5.	✓	Containers in good condition-262.34(a)(1)(i)→265.171	
6.	✓	Containers are compatible with waste-262.34(a)(1)(i)→265.172	
7.	✓	Containers kept closed-262.34(a)(1)(i)→265.173(a)	
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34(a)(1)(i)→265.173(b)	
9.	NA	Containers storing incompatibles separated or protected from each other-262.34(a)(1)(i)→265.177	
10.	✓	Containers of ignitable/reactive waste stored >50 feet from property line [LQGs, I.S. & Permit, only]-262.34(a)(1)(i)→265.176	
11.	✓	Adequate aisle space for type of container management and emergency equipment used-262.34(a)(4)→265.35	
12.	✓	Container stored for less than 90/180/270 days, as applicable-262.34	
13.	X	Storage area inspected weekly-262.34(a)(1)(i)→265.174	
		ADDITIONAL I.S. REQUIREMENTS*	
14.	NA	Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.	NA	"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.	NA	"No Smoking" signs conspicuously posted-265.17(a)	
17.	NA	Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.	NA	LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.	NA	Daily inspections of loading/unloading areas (when in use)-265.15(a)(4)	
		PRE-TRANSPORT REQUIREMENTS*	
20.	NA	Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.	↓	Placards available for use by transporters when applicable-262.33	

#	√/ x	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-262.34(a)(4)→265.34	
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)- 262.34(a)(4)→265.32(c)	
24.	✓	Adequate water supply for fire control equipment-262.34(a)(4)→265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-262.34(a)(4)→265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-262.34(a)(4)→265.31	

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

27. Container inventory: ☐ Actual Count ☐ Approximate count

Waste Type	Container Size	Total
Solvent/resin/adhesive	1 x55 gal. ___ x 30 gal. _____	6 gallons
_____	___x55 gal. ___x 30 gal. _____	_____
_____	___x55 gal. ___x 30 gal. _____	_____
_____	___x55 gal. ___x 30 gal. _____	_____
_____	___x55 gal. ___x 30 gal. _____	_____
_____	___x55 gal. ___x 30 gal. _____	_____
_____	___x55 gal. ___x 30 gal. _____	_____

Total Quantity (pounds, gallons, etc.):_____

the containers had a funnel & material too viscous to flow into containers or spill out

28. How were container volumes verified? topping container & visual inspection

29. Photos taken to verify observations: ☒ YES ☐ NO Numbers: 2 Photo # 16 & 17

30. Container management area location noted on map or diagram: ☒ YES ☐ NO

31. Notes/Observations: EDH This area is a SAA that exceeded the 55-gallon limit. It takes ~ 2-3 months to fill containers i. did not exceed 270 limit.

Appendix 1-9 VISUAL REVIEW WORKSHEET AND CHECKLIST

A. CONTAINER STORAGE AREA SAA No. 1 Area

(Complete one form per storage area)

1. Type of storage area: ☐ <90 day ☐ <180 day ☒ <270 day ☐ I.S. ☐ Permit

2. I.S./Permitted capacity: NA

#	√/ x	REGULATORY REQUIREMENTS*	COMMENTS
3.	X	Date of accumulation marked and visible-262.34(a)(2)	
4.	✓	Containers marked as "Hazardous Waste"-262.34(a)(3)	
5.	✓	Containers in good condition-262.34(a)(1)(i)→265.171	
6.	✓	Containers are compatible with waste-262.34(a)(1)(i)→265.172	
7.	X	Containers kept closed-262.34(a)(1)(i)→265.173(a)	
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34(a)(1)(i)→265.173(b)	
9.	NA	Containers storing incompatibles separated or protected from each other-262.34(a)(1)(i)→265.177	
10.	✓	Containers of ignitable/reactive waste stored ≥50 feet from property line [LQGs, I.S. & Permit, only]-262.34(a)(1)(i)→265.176	
11.	✓	Adequate aisle space for type of container management and emergency equipment used-262.34(a)(4)→265.35	
12.	✓	Containers stored for less than 90/180/270 days, as applicable-262.34	
13.	✓	Storage area inspected weekly-262.34(a)(1)(i)→265.174	
		ADDITIONAL I.S. REQUIREMENTS*	
14.	NA	Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.		"No Smoking" signs conspicuously posted-265.17(a)	
17.		Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.	✓	Daily inspections of loading/unloading areas (when in use)-265.15(a)(4)	
		PRE-TRANSPORT REQUIREMENTS*	
20.	NA	Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.	✓	Placards available for use by transporters when applicable-262.33	Available in main CSA

#	√/ x	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-262.34(a)(4)→265.34	
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)- 262.34(a)(4)→265.32(c)	
24.	✓	Adequate water supply for fire control equipment-262.34(a)(4)→265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-262.34(a)(4)→265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-262.34(a)(4)→265.31	

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

27. Container inventory: ☒ Actual Count ☐ Approximate count

Waste Type	Container Size	Total
Solvent & resin	1 x55 gal. ___ x 30 gal. 55	40 gallons
Solvent & resin	1 x55 gal. ___ x 30 gal. 150 (55 gallon drum)	contained approximately 30 1-gallon pails that were partially filled & 3-5 gallon pails that were partially filled = 10 gallons of liquid
	___x55 gal. ___x 30 gal. _____	
	___x55 gal. ___x 30 gal. _____	
	___x55 gal. ___x 30 gal. _____	
	___x55 gal. ___x 30 gal. _____	
	___x55 gal. ___x 30 gal. _____	

45 gallons

Total Quantity (pounds, gallons, etc.): 95 gallons

28. How were container volumes verified? tapping container & visual observation

29. Photos taken to verify observations: ☒ YES ☐ NO Numbers: photolog # 6-8

30. Container management area location noted on map or diagram: ☒ YES ☐ NO

31. Notes/Observations:

B. SATELLITE ACCUMULATION AREA(S)

1. Total number of satellite areas inspected at facility: 4 ~~9~~ 6

#	REGULATORY REQUIREMENTS	SA1: 3	~~SA2:~~ C170	SA~~3~~: 4	SA~~4~~: 6
2.	Area at or near the point of generation-262.34(c)(1)	✓	✓	✓	✓
3.	Area under the direct control of operator-262.34(c)(1)	✓	✓	✓	✓
4.	Quantities accumulated do not exceed 55 gallons or 1 quart (acute) 262.34(c)(1)	✓	✓	✓	✓
5.	Excess accumulation removed within 3 days 262.34(c)(2)	✓	✓	✓	✓
6.	Containers marked identifying their contents 262.34(c)(1)(ii)	✓	✓	✓	✓
7.	Containers in good condition 262.34(c)(1)(i) – 265.171	✓	✓	✓	✓
8.	Containers are compatible with waste 262.34(c)(1)(i) – 265.172	✓	✓	✓	✓
9.	Container kept closed 262.34(c)(1)(i) – 265.173(a)	X	✓	~~X~~	✓

√ - in compliance X – not in compliance N/A – not applicable

Above Satellite Areas with problems:

SA~~1~~: 3
Name/Location of area: Tool Crib
Person responsible for area: not provided
Type(s) and Volumes of waste accumulated: ~~waste~~ ~30 gallons of solvent resin adhesive mixture
Number and Type of containers: 1 - 55 gallon containers

C170
~~SA2:~~
Name/Location of area: C170
Person responsible for area: not provided
Type(s) and Volumes of waste accumulated: naphtha - ~3 gallons
Number and Type of containers: 1 - 5 gallon ~~plastic~~ container

SA~~3~~: 4
Name/Location of area: Line 7
Person responsible for area: not provided
Type(s) and Volumes of waste accumulated: 10 gallons of solvent resin adhesive mixture
Number and Type of containers: 1 - 55 gallon containers

SA~~4~~: 6
Name/Location of area: Ground Building
Person responsible for area: Dennis Gates
Type(s) and Volumes of waste accumulated: Waste flammable liquids - 6 gallons
Number and Type of containers: 1 - 55 gallon container.

B. SATELLITE ACCUMULATION AREA(S)

1. Total number of satellite areas inspected at facility: 8

#	REGULATORY REQUIREMENTS	SA1: 7	SA7: 8	SA3: 2	~~SA4:~~ Solvent Rags
2.	Area at or near the point of generation-262.34(c)(1)	✓	✓	✓	✓
3.	Area under the direct control of operator-262.34(c)(1)	✓	✓	✓	✓
4.	Quantities accumulated do not exceed 55 gallons or 1 quart (acute) 262.34(c)(1)	✓	✓	✓	✓
5.	Excess accumulation removed within 3 days-262.34(c)(2)	✓	✓	✓	✓
6.	Containers marked identifying their contents-262.34(c)(1)(ii)	✓	✓	✓	✓
7.	Containers in good condition 262.34(c)(1)(i) - 265.171	✓	✓	✓	✓
8.	Containers are compatible with waste 262.34(c)(1)(i) - 265.172	✓	✓	✓	✓
9.	Containers kept closed 262.34(c)(1)(i) - 265.173(a)	✓	✓	✓	✓

√ - in compliance X – not in compliance N/A – not applicable

Above Satellite Areas with problems:

7 SA1: Name/Location of area: Cement Building
Person responsible for area: Dennis Gates
Type(s) and Volumes of waste accumulated: Waste solvents - resin adhesive 30 gallons
Number and Type of containers: 1 - 55 gallon container

8 SA1: Name/Location of area: Cement Building
Person responsible for area: Dennis Gates
Type(s) and Volumes of waste accumulated: Waste Paints - 30 gallons
Number and Type of containers: 1 - 55 gallon containers

2 SA3: Name/Location of area: Mixing Room
Person responsible for area: not provided
Type(s) and Volumes of waste accumulated: Solvents - glue 30 gallons
Number and Type of containers: 1 - 55 gallon containers

Solvent Rags SA4: Name/Location of area: Cement Building
Person responsible for area: Dennis Gates
Type(s) and Volumes of waste accumulated: Solvents - rags, PT gallons
Number and Type of containers: 1 - 55 gallon container

Appendix 1-10

EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☒ Yes ☐ No
   - Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurring.
   - Illegal units-unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information.
   - Illegal disposal-how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/disposed of, quantity.

N/A ☐ Identified/verified violations from previous inspection were corrected (if applicable)
☑ Addressed all unresolved inspection related issues
☑ Summarized findings and observations for the facility representatives

NOV issued? ☑ Yes ☐ No ☑ Violations clearly identified and explained, including: circumstances, location, and applicable regulations

☑ Explained the importance of a timely (14 day) and adequate response
☑ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ
☑ Explained that compliance officer will make final compliance decisions and that all compliance questions should be directed toward them
☑ Explained that recommendations provided are for informational purposes only and DO NOT require specific actions by the facility
☑ Provided facility with CBI form
☑ Prepared Document Receipt form

3. Specific information requested from facility? ☐ Yes ☑ No

4. Facility appears to have awareness of RCRA regulations? ☑ Yes ☐ No

5. Facility has its own environmental staff? ☑ Yes ☐ No

6. Facility has copy of applicable regulations? ☑ Yes ☐ No

7. Attitude and demeanor of facility representative(s); ☑ OK ☐ Not OK

8. Notes/Observations:

Appendix 2-2 **Universal Waste** (Additional Checklists)

#	√ / x	REGULATORY REQUIREMENTS*	COMMENTS
1.	NA	Notification **(Not Required for small quantity handlers, go to 3)**- 273.32 Large quantity handler must have sent written notification of universal waste management to the Regional Administrator, and received an EPA Identification Number, before meeting or exceeding the 5,000 kilogram storage limit, unless the following conditions are met: (1) large quantity handler has already notified of hazardous waste management activities and received and EPA Identification Number, (2) large quantity handler of universal waste who manages recalled universal waste pesticides as described in 40 CFR 273.3(a)(l) and who has sent notification to EPA as required by 40 CFR 165.	
a.		This notification must include - 273.32 (b): (1) universal waste handler's name and mailing address; (2) name and business telephone number of the person at the universal waste handler's site who should be contacted regarding universal waste management activities; (3) the address or physical location of the universal waste management activities; (4) a list of all types of universal waste managed by the handler; (5) a statement indicating that the handler is accumulating more than 5000 kg of universal waste at one time and the types of universal waste the handler is accumulating above the quantity.	
2.	✓	Universal waste battery that shows evidence of leakage, spillage, or damage that could cause leakage under reasonable foreseeable conditions is contained. The container is closed, structurally sound, compatible, and lacks evidence of leakage, spillage, or damage that could cause leakage-273.13(a)(l)/273.33(a)(l) **If not generated, go to 5.**	
3.	✓	Waste Management of Universal Batteries as follows, provided the casing of each individual battery cell is not breached or remains intact and closed (except to remove electrolyte)-273.13(a)(2)/273.33(a)(2)	
a.	✓	Sorting batteries by type-273.13(a)(2)(i)/273.33(a)(2)(i)	
b.	✓	Mixing battery types in one container-273.13(a)(2)(ii)/273.33(a)(2)(ii)	
c.	✓	Discharging batteries so as to remove the electric charge-273.13(a)(2)(iii)/273.33(a)(2)(iii)	
d.	NA	Regenerating used batteries-273.13(a)(2)(iv)/273.33(a)(2)(iv)	
e.	NA	Disassembling batteries or battery packs into individual batteries or cells- 273.13(a)(2)(v)/273.33(a)(2)(v)	
f.	NA	Removing batteries from consumer products-273.13(a)(2)(vi)/273.33 (a)(2)(vi)	

g.	NA	Removing electrolyte from batteries-273.13(a)(2)(vii)/273.33(a)(2)(vii)	
4.		Handler determines whether any waste(s) generated as a result of the activities listed in 3 above, exhibit a characteristic of hazardous waste- 273.13(a)(3)/273.33(a)(3) (If waste is regulated as hazardous waste, complete the hazardous waste generator inspection checklist)	
a.		If yes, electrolyte and/or other solid waste(s) identified as a characteristic hazardous waste, 40 CFR 260 - 272 requirements are met-273.13(a)(3)(i)/273.33(a)(3)(i)	
b.	✓	If no, the handler manages the waste(s) in an environmentally sound manner that is in compliance with applicable state and federal regulation-273.13(a)(3)(ii)/273.33(a)(3)(ii)	
5.	NA	Universal Waste Pesticides managed as follows to prevent releases -273.13(b)/273.33(b) **If not generated, go to 6.**	
a.		In a container that remains closed, structurally sound, compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause leakage, under reasonably foreseeable conditions-273.13(b)(l)/273.33(b)(l)	
b.		In a container that does not meet the conditions listed in 273.13(b)(l) [6.a. above], provided that the unacceptable container is over-packed in a container that does meet those requirements - 273.13(b)(2)/273.33(b)(2)	
c.		In a tank that meets the requirements of 40 CFR part 265 subpart J, except for 40 CFR 265.197(c), 265.200, and 265.201-273.13(b)(3)/273.33(b)(3)	
d.	✓	In a transport vehicle or vessel that is closed, structurally sound, compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause leakage, under reasonably foreseeable conditions -273.13(4)/273.33(4)	
6.	✓	Universal Waste Thermostats managed in a way that prevents releases of any universal waste or component of universal waste-273.13(c)/273.33(c) **If not generated, go to 7.**	
a.	✓	Universal waste thermostat that shows evidence of leakage, spillage, or damage that could cause leakage under reasonable foreseeable conditions is contained. The container is closed, structurally sound, compatible, and lacks evidence of leakage, spillage, or damage that could cause leakage-273.13(c)(l)/273.33(c)(l)	

b.	NA DH	If mercury containing ampules are removed, the handler: (i) removes the ampules in a manner designed to prevent breakage, (ii) removes ampules only over or in a containment device, (iii) ensures that a mercury clean-up system is readily available to immediately transfer any spilled/leaked mercury from the containment device to an appropriate container per 40 CFR 262.34, (iv) immediately transfers any spilled/leaked mercury to an appropriate container per 40 CFR 262.34, (y) ensures area where ampules are removed is well ventilated and monitored to ensure compliance with OSHA exposure levels for mercury, (vi) ensure employees removing ampules are thoroughly familiar with proper waste mercury handling and emergency procedures, (vii) stores removed ampules in closed, non-leaking containers that are in good condition, (viii) stored in containers with packing materials adequate to prevent breakage during storage, handling, and transportation- 273.13(c)(2)/273.33(c)(2) **If not generated, go to 7.**	
c.		Determines if the following exhibit a characteristic of hazardous waste: (A) mercury or clean-up residues resulting from spills or leaks: and/or (B) other solid waste generated as a result of removal of mercury containing ampules - 273.13(c)(3)(i)/273.33(c)(3)(i)	
d.		If the mercury, residues, and/or other solid waste do exhibit a characteristic of hazardous waste, it must managed per applicable hazardous waste requirements and the handler is the generator-273.13(c)(3)(ii)/273.33(c)(3)(ii)	
e.	✓	If the mercury, residues, and/or other solid waste do **NOT** exhibit a characteristic of hazardous waste, the handler may manage the waste in compliance with federal, state, or local solid waste regulations -273.13(c)(3)(iii)/273.33(c)(3)(iii)	
7.	✓	Lamps are managed in a way that prevents releases of any universal waste or component of universal waste to the environment-273.13 (d)/273.33 (d)	
a.	X DH	Lamps are kept in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamp. The containers and packages are closed, and lack evidence of leakage, spillage, or damage that could cause leakage- 273.13(d)(l)/273.33(d)(l)	4ft long holes in caged area, and Area #3 were not taped closed
b.	✓	Universal waste lamps that show evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment are immediately cleaned up and placed in a container. The container is closed, structurally sound, compatible, and lacks evidence of leakage, spillage, or damage that could cause leakage or release of mercury or other hazardous constituents to the environment -273.13(d)(2)/273.33(d)(2)	

8.	NA	Storage over one year is solely for the purpose of accumulation of such quantities as necessary to facilitate, proper recovery, treatment, or disposal and the handler provides proof of this-273.15(b)/273.35(b)	
a.		Small and large quantity handlers must demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received-273.15(c)/273.35(c), by: (1) placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received-27345(c)(l)/273.35(c)(l); (2) marking or labeling each individual item of universal waste with the date it became a waste or was received - 273.15(c)(2)/273.35(c)(2); (3) maintaining an inventory system on-site that identities, the earliest date that each universal waste became a waste or was received - 273.15(c)(3)/273.35(c)(3); (4) maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received –273.15(c)(4)/273.35(c)(4); (5) placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste items or a group of containers of universal waste became a waste or was received -273.15(c)(5)/27335(c)(5); or (6) any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received-273.15(c)(6)/273.35(c)(6). List and explain.	
9.	NA	A small quantity/large quantity handler of universal waste must immediately contain all releases of universal wastes and other residues from universal wastes-273.17(a)/273.37(a)	no releases observed
a.		A small quantity/large quantity handler of universal waste must determine whether any material resulting from the release is hazardous waste, and if so, must manage the hazardous waste in compliance with all applicable requirements of 40 CFR parts 260 through 272. The handler is considered the generator of the material resulting from the release, and must manage it in compliance with 40 CFR 262 - 273.17(b)/273.37(b)	
10	NA	Small quantity/large quantity handler of universal waste that self-transports universal waste off-site, becomes a universal waste transporter for those self-transportation activities and must comply with the transporter requirements of subpart D of this part while transporting the universal waste-273.18(b)/273.38(b)	
a.		If a universal waste being offered for off-site transportation **meets the definition of hazardous materials** under 49 CFR parts 171 through 180, a small quantity/ large quantity handler must package, label, mark and placard the shipment, and prepare the proper shipping papers in accordance with applicable DOT regulations (49 CFR parts 172 through 180)-273.18(c)/273.38(c) **If not, skip.**	
b.		Prior to sending a shipment to another universal waste handler, the originating handler must ensure that the receiving handler agrees to receive the shipment-273.18(d)/273.38(d)	

c.		If a shipment sent by a small quantity/large quantity handler to another handler or to a designated facility is rejected, the originating handler must either: (l) receive the waste back when notified that the shipment has been rejected, or (2) agree with the receiving handler on a destination facility to which the shipment will be sent- 273.18(e)/273.38(e) **If not, skip.**	
d.		Small, quantity/large quantity handler of universal waste may reject a shipment or a portion of a shipment containing universal waste that he has received from another handler. He must contact the originating handler to notify him of the rejections and to discuss reshipment. The handler must: (1) send the shipment back to the originating handler, or (2) if agreed to by both parties, send the shipment to a destination facility- 273.18(f)/273.38(f)	
e.		**If** a small quantity/large quantity handler of universal waste **receives a shipment containing hazardous waste that is not a universal waste**, the handler must immediately notify the appropriate regional EPA office of the illegal shipment, and provide the name, address, and phone number of the originating shipper. 273.18(g)/273.38(g)	
f.		**If** a small quantity/large quantity handler of universal waste **receives a shipment of non-hazardous, non-universal waste**, the handler may manage the waste in any way that is in compliance with applicable federal, state or local solid waste regulations. 273.18(h)/273.38(h)	
11.	N/A	Tracking Universal Waste Shipments 273.19/273.39 Small quantity handler -N/A - **Go to 12**	
a.		*Receipt of Shipment* - A large quantity handler must keep a record of each shipment received, per log, invoice, manifest, bill of lading, or other shipment document. The record for each shipment received must include: (1) name and address of the originating universal waste handler or foreign shipper from whom the universal waste was sent; (2) the quantity of each type of universal waste received; (3) the date of receipt of the shipment- 273.3 9(a)	
b.		*Shipments off-site* - A large quantity handler must keep a record of each shipment of universal waste sent from the handler to other facilities per log, invoice, manifest, bill of lading or other shipping document. The record for each shipment sent must include: (1) name and address of the universal waste handler, destination facility or foreign destination to whom the universal waste was sent; (2) the quantity of each type of universal waste sent; (3) the date the shipment left the facility.- 273.39(b)	
c.		*Record Retention* - Records for receipt of shipment [273.39(c)(l)] and records for shipments off-site [273.39(c)(2)] must be kept for at least three years from the date of receipt or departure from the facility, respectively.	
12.	N/A	Exports 273.30/273.40	

a.	N/A	Small quantity/large quantity handler who sends universal waste to a foreign destination other than to those OECD countries specified in 40 CFR 262.58(a)(1) (in which case the handler is subject to the requirements of 40 CFR part 262, subpart H) must: (1) comply with the requirements applicable to a primary exporter in 40 CFR 262.53, 262.56(a)(1) through (4), (6), and (b) and 262.57; (2) export such universal waste only upon consent of the receiving country and in conformance with the EPA Acknowledgement of Consent as defined in subpart E of part 262 of this chapter; and (3) provide a copy of the EPA Acknowledgement of Consent for the shipment to the transporter transporting the shipment for export.	

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

13. Notes/Observations:_____

Assessing Universal Waste *Transporters* (40 CFR 273, Subpart D)

#	√/ x	REGULATORY REQUIREMENTS*	COMMENTS
1.	N/A	Prohibited from: (1) disposing of universal waste; and (2) diluting or treating universal waste, except by responding to releases- 273.51	
2.		Transporter registered as a universal waste transporter in respective state, if required: List state regulatory citation _____	
3.		Waste management- 273.52 (1) Comply with all applicable DOT regulations in 49 CFR part 171 through 180 for transport of any universal waste that meets the definition of hazardous material in 49 CFR 171.8. (Since universal waste is not considered hazardous waste per EPA regulations, it is not considered hazardous waste under DOT regulations.)- 273.52(a) (2) Some universal waste materials are regulated by DOT as hazardous materials because they meet the criteria for one or more hazard classes specified in 49 CFR 173.2. Since universal waste shipments do not require a manifest, they may not be described by the DOT proper shipping name "hazardous waste, (l) or (s), n.o.s.", nor may the hazardous material shipping name be modified by adding the work "waste."- 273.52(b)	
4.		Storage Time Limits- 273.53 (1) Universal waste transporter may only store the universal waste at a universal waste transfer facility for ten days or less- 273.53(a) (2) If a transporter stores over 10 days, the transporter becomes a universal waste handler and must comply with the applicable requirements of subpart B or C of this part while storing the universal waste- 273.53(b)	

5.	N/A	Response to Releases- 273.54 (1) immediately contains all releases of universal wastes and other residues from universal wastes- 273.54(a). (2) determines whether any material resulting from the release is hazardous waste, and if so, the waste is subject to all applicable requirements of 40 CFR parts 260 through 272 and the transporter is subject to 40 CFR part 262 - 273.54(b)	
6.		Off-site Shipments- 273.55 (1) Prohibited from transporting to a place other than a universal waste handler, a destination facility, or a foreign destination-273.55(a) (2) If meets the DOT definition of hazardous materials under 49 CFR 171.8, the shipment must be properly described on a shipping paper per DOT regulations under 49 CFR part 172. – 273.5(b).	
7.		Exports- 273.56 A universal waste transporter transporting a shipment of universal waste to a foreign destination other than to those OECD countries specified in 40 CFR 262.58(a)(1)(in which case the transporter is subject to 40 CFR 262, subpart H) may not accept a shipment if the transporter knows the shipment does not conform to the EPA Acknowledgement of Consent. In addition, the transporter must ensure that: (1) a copy of the EPA Acknowledgement of consent accompanies the shipment- 273.56(a); and (2) the shipment is delivered to the facility designated by the person initiating the shipment- 273.56(b)	

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

DOCUMENTATION: ***HOW*** are the facts known? ***WHO*** said what? ***WHEN*** did it happen? ***HOW*** long did it happen? and ***WHAT PROOF WAS OBTAINED?***

ATTACHMENT 4

RECEIPT FOR DOCUMENTS AND SAMPLES

(One Page)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name
Hennigas Automotive Iowa, Inc.
Facility Address
3200 Main St. Keokuk, IA 52632

Documents Collected? YES X (list below) NO___

Samples Collected? YES___ (list below) NO X Split Samples: YES___ NO___

Documents/Samples were: 1)Received no charge X 2)Borrowed___ 3)Purchased___

Amount Paid: $_____ Method: Cash___ Voucher___ To Be Billed___

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

==========

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

1. Used oil bill of lading (1 page)
2. MSDS Polydip 5 (4 pages)
3. Parts washer exchange ticket (1 page)
4. Manifests and LDRs (14 pages)
5. Non-Hazardous Waste Manifests (2 pages)
6. Solid Waste / Non-Hazardous waste manifests (2 pages)
7. Site map (1 page)

~~8. Photos (3 pages)~~ DH

Facility Representative (print)	Signature/Date
Joe Schute Joe Lehster	Joe Lehster 7/20/10
Inspector (print)	Signature/Date
David Homer	David Homer 7/20/10

U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101

(rev:1/20/93)

Attachment 4 Page 1 of 1

ATTACHMENT 5

CONFIDENTIALITY NOTICE

(One Page)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name Hennigs Automotive Iowa Inc	
Facility Address 3200 Main St. Keokuk, IA ~~52632~~ 52632	
Inspector (print) DAVID HOMER	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101 Tetra Tech	Date ~~7/20/10~~ 7/20/10

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. No statute specifically requires disclosure of the information.

3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and DO NOT want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print)	Signature/Date
Joe Lehnter	Joe Lehnter 7/20/10

I have received this Notice and DO want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested;

ATTACHMENT 6

NOTICE OF PRELIMINARY FINDINGS

(Three Pages)

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: Honniges Automotive Iowa, Inc.
ADDRESS: 3200 Main Street
Keokuk, IA 52632
EPA ID NUMBER: IAD000513023 **DATE:** 7/20/10

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. Failure to keep containers in the satellite accumulation area closed as required by 40CFR 262.34(c)(1)(i) and 40CFR 265.173(a). c(1)(i) DH returned
2. ~~Failure to limit satellite accumulation containers to 55 gallons as required by 40CFR 262.34(c)(1).~~ (2) DH DH
3.
4.
5.
6.
7.

If you have any questions regarding these findings please contact

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Joe Lehrter **TITLE:** Sr. EHS Specialist

SIGNATURE: Joe Lehrter

This document was prepared by David Homer

NOTICE OF PRELIMINARY FINDINGS (Continued)

FACILITY NAME: Hennriges Automotive Iowa, Inc
ADDRESS: 320 Main St
Keokuk, IA 52632
EPA ID NUMBER: IAD 005136023 DATE: 8/19/2010

3 Failure to place an accumulation date on a container that exceeded the satellite accumulation area limit of 55 gallons for more than 3 days as required by 40 CFR 262.34(a)(a) referencing 40 CFR 262.34(a)(2)

4. Failure to inspect the container storage area (PE 228 Area) weekly as required by 40 CFR 262.34(d)(2) referencing 40 CFR 265.174.

5 Failed to label the oil sludge container with the words "USED OIL" as required by 40 CFR 279.22(c)(1).

INITIALS OF RECIPIENT: _____

INITIALS OF PREPARER: DHH

NOTICE OF PRELIMINARY FINDINGS (Continued)

FACILITY NAME: Hennages Automotive Iowa Inc.
ADDRESS: 3200 Main St, Keokuk, IA 52632
EPA ID NUMBER: IAD006136023 **DATE:** 9/23/16

6. Failure to close containers in the SAA No. 1 Area, both 55 gallon container and cardboard containers as required by 40 CFR 262.34(a)(2) referencing 265.173(a) for less than 270 day storage area

7. Failure to maintain universal waste lamps in a closed container as required by 40 CFR 273.13(d)(1)

INITIALS OF RECIPIENT: _____

INITIALS OF PREPARER: DHH

NOTICE OF PRELIMINARY FINDINGS (Continued)

FACILITY NAME: Hennges Automotive Iowa Inc.
ADDRESS: 3200 Main St.
Keokuk, IA 52632
EPA ID NUMBER: IAD006136023 **DATE:** 9/23/16

6 Failure to close containers in the SAA No. 1 Area, 55 gallon containers and bucket containers as required by 40 CFR 262.34(a)(2) referencing 265.173(a) for less than 270 day storage area

7. Failure to maintain universal waste lamps in a closed container as required by 40 CFR 273.13(d)(1)

INITIALS OF RECIPIENT: _____

INITIALS OF PREPARER: DHH

10 3 3

ATTACHMENT 7

FACILITY SITE PLAN

(One Page)

Main Floor

ATTACHMENT 8

PHOTOGRAPHIC DOCUMENTATION

(27 Pages)

PHOTO LOG

Facility Name / City: Henniges Automotive Iowa, Inc.
3200 Main Street
Keokuk, Iowa 52632

Facility ID #: IAD006224661
Date : July 20, 2010
Photographer: David Homer
Type of Camera: Olympus C-4000, Serial # 237C13059
Digital Recording Media: Flashcard
All digital photos were copied by: David Homer on July 22, 2010.
All digital photos were copied to: Tetra Tech EM Inc. desktop computer
Original copy is stored in: Tetra Tech EM Inc.'s internal office server. Digital photos were downloaded to server by David Homer. No changes were made in the original image files prior to storage on the server.

Report Photo #	Photographer	Date	Approx. Time	File Name	Description
1	David Homer	7/20/10	AM	HA_001.jpg	This photograph shows a container of rubber mixing waste being collected for off-site recycling. The inset shows a close-up of the label.
2	David Homer	7/20/10	AM	HA_002jpg	This photograph shows a container of rubber mixing waste being collected for off-site recycling (right) and a container of general trash.
3	David Homer	7/20/10	AM	HA_003.jpg	This photograph shows the collection of bag house dust from the mixing area. The bag contains a mixture of carbon black and calcium carbonate.
4	David Homer	7/20/10	AM	HA_004.jpg	This photograph shows the collection of bag house dust from the mixing area. The bag contains a mixture of carbon black and calcium carbonate.
5	David Homer	7/20/10	AM	HA_006.jpg	This photograph shows four 55-gallon containers used for collection of carbon black that is swept from the floor of the unloading area after arrival of carbon black via rail.
6	David Homer	7/20/10	AM	HA_010.jpg	This photograph shows a cardboard box in satellite accumulation area (SAA) No. 1 for waste solvent/resins/adhesive mixtures. The container is a less-than-270-day storage container and is not closed (**NOPF No. 3**). It also does not have an accumulation date (**NOPF No .6**).
7	David Homer	7/20/10	AM	HA_011.jpg	This photograph shows the interior of the cardboard box in the SAA No. 1 Area depicted in Photograph No. 6. It contains a variety of buckets, some containing waste solvent and adhesive mixtures. It was determined the container had more than 55 gallons of waste containers and was not a SAA, but rather a less-than-270-day container storage area (CSA).

Report Photo #	Photographer	Date	Approx. Time	File Name	Description
8	David Homer	7/20/10	AM	HA_012.jpg	This photograph shows the other container in the SAA No. 1 Area. Because the container received waste from another container it is not a SAA, but rather a less-than-270-day CSA. The container is not closed (**NOPF No. 6**). It is in good condition and properly marked. The container did not have accumulation date (**NOPF No. 3**). The inset shows a blow-up of the label.
9	David Homer	7/20/10	AM	HA_013.jpg	This photograph shows the SAA No. 3 in the tool crib area. The container is not closed (**NOPF No. 1**). The container is in good condition, properly marked, and contains less than 55 gallons.
10	David Homer	7/20/10	AM	HA_014.jpg	This photograph shows the waste solvent glue mixture in the funnel on the 55-gallon container in the SAA No. 3. The mixture is so viscous that it does not flow into the container very quickly. The insets show blow-ups of the bottom of the funnel and the container label.
11	David Homer	7/15/06	AM	HA_017.jpg	This photograph shows the SAA No. 4. The container is not closed (**NOPF No. 1**). It is in good condition, properly marked, and contains less than 55 gallons. The inset shows a blow-up of the label.
12	David Homer	7/20/10	AM	HA_018.jpg	This photograph shows the contents of the funnel in the 55-gallon SAA container in SAA No. 4, depicted in Photograph No. 11.
13	David Homer	7/20/10	AM	HA_019.jpg	This photograph shows instructions for management of hazardous waste in the SAA No. 4. These were on the side of the flammables cabinet used to accumulate the waste.
14	David Homer	7/20/10	AM	HA_020.jpg	This photograph shows a 55-gallon container in SAA No. 2 in the mixing room. The container was in good condition, properly marked, and closed and properly labeled. The inset shows a blow-up of the label.
15	David Homer	7/20/10	AM	HA_035.jpg	This photograph shows the 55-gallon container of solvent adhesive waste in SAA No. 8 in the Cement Building. The inset shows a blow-up of the label.
16	David Homer	7/20/10	AM	HA_026.jpg	This photograph shows the funnel contents in 55-gallon container in SAA in the 228 Area. The container was completely full of waste. Therefore, the facility failed to mark the container with the accumulation date (**NOPF No. 3**).
17	David Homer	7/20/10	AM	HA_027.jpg	This photograph shows the 55-gallon container of solvent adhesive waste in SAA No. 8 in the Cement Building. The container was closed, in good condition, properly marked, and contained less than 55 gallons of waste. The inset shows a blow-up of the label.

Report Photo #	Photographer	Date	Approx. Time	File Name	Description
18	David Homer	7/20/10	AM	HA_036.jpg	This photograph shows the 55-gallon container of waste flammable liquid waste in SAA No. 6 in the Cement Building. The container was closed, in good condition, properly marked, and contained less than 55 gallons of waste. The inset shows a blow-up of the label.
19	David Homer	7/20/10	AM	HA_046.jpg	This photograph shows a 5-gallon container of waste flammable liquid (naphtha) in the SAA in the C170 Area. The other materials in the cabinet are in use and not waste materials. The inset shows a blow-up of the label.
20	David Homer	7/20/10	AM	HA_037.jpg	This photograph shows a 55-gallon SAA container of solvent rags in the Cement Building. The inset shows a blow-up of the label.
21	David Homer	7/20/10	AM	HA_040.jpg	This photograph shows the used oil AST in the Interior Tank Farm area.
22	David Homer	7/20/10	AM	HA_042.jpg	This photograph shows the proper labeling on the used oil AST in the Interior Tank Farm.
23	David Homer	7/20/10	AM	HA_041.jpg	This photograph shows the level gauge (see arrow) for the oil tank in the Interior Tank Farm.
24	David Homer	7/20/10	AM	HA_033.jpg	This photograph shows the four storage containers of used oil sludge in the CSA. The containers were in good condition and properly marked.
25	David Homer	7/20/10	AM	HA_034.jpg	This photograph shows an example of the labeling of the containers of used oil sludge in the CSA.
26	David Homer	7/20/10	AM	HA_039.jpg	This photograph shows a used oil storage container in the Cement Building. The container was not marked with the words "used oil" (**NOPF No. 5**). The inset shows a blow-up of the label.
27	David Homer	7/20/10	AM	HA_015.jpg	This photograph shows the solvent parts washer in the tool crib area.
28	David Homer	7/20/10	AM	HA_028.jpg	This photograph shows the parts washer in the general maintenance area.
29	David Homer	7/20/10	AM	HA_025.jpg	This photograph shows the storage area for universal waste in the manufacturing area of the facility.
30	David Homer	7/20/10	AM	HA_022.jpg	This photograph shows a universal waste lamp storage container in the universal waste storage cage. The inset shows a blow-up of the label.
31	David Homer	7/20/10	AM	HA_024.jpg	This photograph shows universal waste lamps in a fiber container depicted in Photograph No. 30 in the universal waste storage area.
32	David Homer	7/20/10	AM	HA_021.jpg	This photograph shows a universal waste lamp storage container in the universal waste storage cage. The inset shows a blow-up of the label. The container is not considered closed because the lid is not taped shut (**NOPF No. 7**).

Report Photo #	Photographer	Date	Approx. Time	File Name	Description
33	David Homer	7/20/10	AM	HA_045.jpg	This photograph shows the universal waste storage area No. 3. The inset shows a blow-up of the label.
34	David Homer	7/20/10	AM	HA_043.jpg	This photograph shows the storage container for universal waste lamps in storage area No. 3. The inset shows a blow-up of the label.
35	David Homer	7/20/10	AM	HA_044.jpg	This photograph shows the storage container for universal waste lamps in storage area No. 3. The container is not considered closed because the lid is not taped shut (**NOPF No. 7**).
36	David Homer	7/20/10	AM	HA_023.jpg	This photograph shows the universal waste storage of ballasts and mercury-containing wastes in the universal waste cage area. The insets show blow-ups of the labels.
37	David Homer	7/20/10	AM	HA_016.jpg	This photograph shows spent lead-acid batteries from maintenance of electric carts and lift trucks. The batteries are returned to either O'Reilly Auto Parts or M&H Equipment for recycling.
38	David Homer	7/20/10	AM	HA_038.jpg	This photograph shows a 55-gallon container in SAA No. 7 with paint waste in the Cement Building. The container was properly marked, closed, and in good condition. The inset shows a blow-up of the label.
39	David Homer	7/20/10	AM	HA_008.jpg	This photograph shows a typical container of scrap metal that is collected by North Cedar – South to be recycled.
40	David Homer	7/20/10	AM	HA_009.jpg	This photograph shows a container that holds non-hazardous waste floor sweepings from the small compound area. The inset shows a blow-up of the label.
41	David Homer	7/20/10	AM	HA_029.jpg	This photograph shows three 55-gallon containers of hazardous waste in the CSA. All containers were in good shape, dated, and properly marked. These containers are also shown in Photograph Nos. 42 through 44.
42	David Homer	7/20/10	AM	HA_030.jpg	This photograph shows the hazardous waste label with accumulation date on container No. 1 in Photograph No. 41.
43	David Homer	7/20/10	AM	HA_031.jpg	This photograph shows the hazardous waste label with accumulation date on container No. 2 in Photograph No. 41.
44	David Homer	7/20/10	AM	HA_032.jpg	This photograph shows the hazardous waste label with accumulation date on container No. 3 in Photograph No. 41.
45	David Homer	7/20/10	AM	HA_007.jpg	This photograph shows two containers that hold absorbent material used to clean up spills of oil in the mixing area.
46	David Homer	7/20/10	AM	HA_006.jpg	This photograph shows the label for the containers shown in Photograph No. 45.

Henniges Automotive Iowa, Inc.
Keokuk, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a container of waste rubber being collected for off-site recycling.	1
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a container of waste rubber being collected for off-site recycling and a container of general trash.	2
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

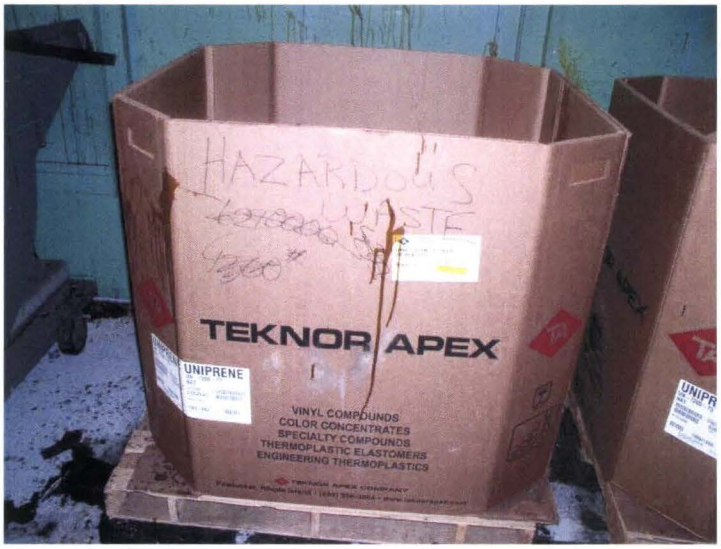
Henniges Automotive Iowa, Inc.
Keokuk, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the collection of bag house dust from the mixing area. The bag contains a mixture of carbon black and calcium carbonate.	3
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the collection of bag house dust from the mixing area. The bag contains a mixture of carbon black and calcium carbonate.	4
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

Henniges Automotive Iowa, Inc.
Keokuk, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows four 55-gallon containers used for collection of carbon black that is swept from the floor of the unloading area after arrival of carbon black via rail.	5
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	



TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a cardboard box in satellite accumulation area (SAA) No. 1 for waste solvent/resins/adhesive mixtures. The container is a less-than-270-day storage container and is not closed (**NOPF No. 3**). It also does not have an accumulation date (**NOPF No. 6**).	6
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

Henniges Automotive Iowa, Inc.
Keokuk, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the interior of the cardboard box in the SAA No. 1 Area depicted in Photograph No. 6. It contains a variety of buckets, some containing waste solvent and adhesive mixtures. It was determined the container had more than 55 gallons of waste containers and was not a SAA but rather a less-than-270-day container storage area (CSA).	7
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the other container in the SAA No. 1 Area. Because the container received waste from another container it is not a SAA, but rather a less-than-270-day CSA. The container is not closed (**NOPF No. 3**). It is in good condition and properly marked. The container does not have accumulation date (**NOPF No. 6**). The inset shows a blow-up of the label.	8
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

Henniges Automotive Iowa, Inc.
Keokuk, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the SAA No. 3 in the tool crib area. The container is not closed (**NOPF No. 1**). The container is in good condition, properly marked and contains less than 55 gallons.	9
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the waste solvent glue mixture in the funnel on the 55-gallon container in the SAA No. 3. The insets show blow-ups of the bottom of the funnel and the container label.	10
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

Henniges Automotive Iowa, Inc.
Keokuk, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the SAA No. 4. The container is not closed (**NOPF No. 1**). It is in good condition and properly marked and contains less than 55 gallons. The inset shows a blow-up of the label.	11
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a the contents of the funnel in the 55-gallon SAA container in SAA No. 4, depicted in Photograph No. 11.	12
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

Henniges Automotive Iowa, Inc.
Keokuk, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows instructions for management of hazardous waste in the SAA No. 4. These were on the side of the flammables cabinet used to accumulate the waste.	13
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

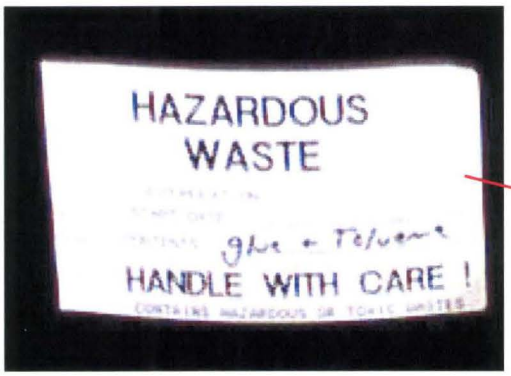
TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a 55-gallon container in SAA No. 2 in the mixing room. The container was in good condition, properly marked, and closed and properly labeled. The inset shows a blow-up of the label.	14
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

Henniges Automotive Iowa, Inc.
Keokuk, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the 55-gallon container in SAA located in the 228 Area. The container was in good condition, properly marked, closed, and properly labeled. The inset shows a blow-up of the label.	15
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the funnel contents in 55-gallon container in SAA in the 228 Area. The container was completely full of waste. Therefore, the facility failed to mark the container with the accumulation date (**NOPF No. 3**).	16
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

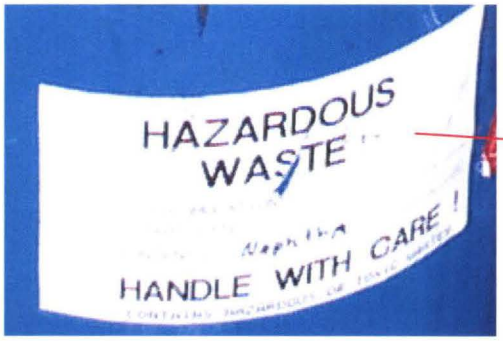
Henniges Automotive Iowa, Inc.
Keokuk, Iowa



TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the 55-gallon container of solvent adhesive waste in SAA No. 8 in the Cement Building. The container was closed, in good condition, properly marked, and contained less than 55 gallons of waste. The inset shows a blow-up of the label.	17
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the 55-gallon container of waste flammable liquid waste in SAA No. 6 in the Cement Building. The container was closed, in good condition, properly marked, and contained less than 55 gallons of waste. The inset shows a blow-up of the label.	18
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

Henniges Automotive Iowa, Inc.
Keokuk, Iowa

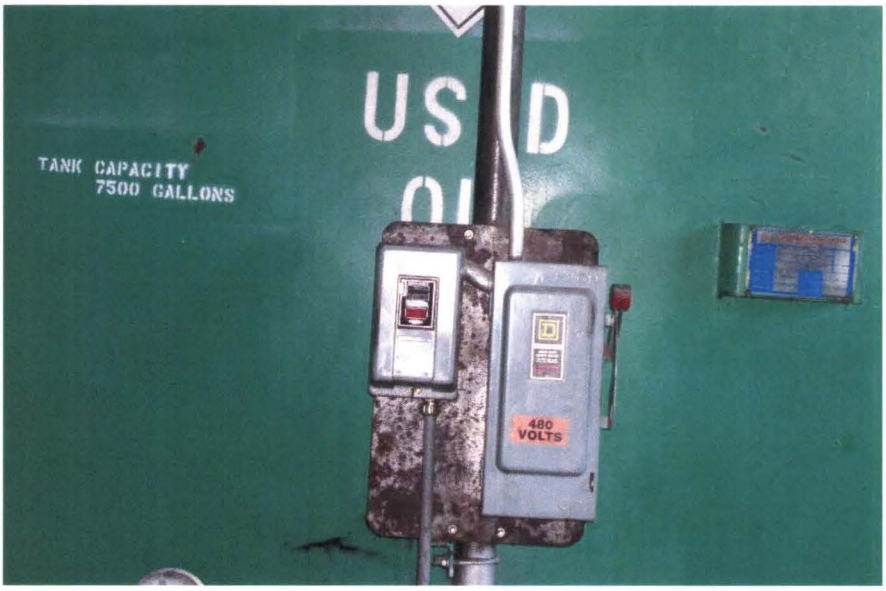


TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a 5-gallon container of waste flammable liquid (naphtha) in the SAA in the C170 Area. The container is in good condition, closed and properly marked. The other materials in the cabinet are in use and not waste materials. The inset shows a blow-up of the label.	19
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a 55-gallon SAA container of solvent rags in the Cement Building. The container is in good condition, closed and properly marked. The inset shows a blow-up of the label.	20
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

Henniges Automotive Iowa, Inc.
Keokuk, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the used oil tank in the Interior Tank Farm area. The tank is in good condition and properly marked with the words "used oil."	21
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	



TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the proper labeling on the used oil tank in the Interior Tank Farm.	22
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

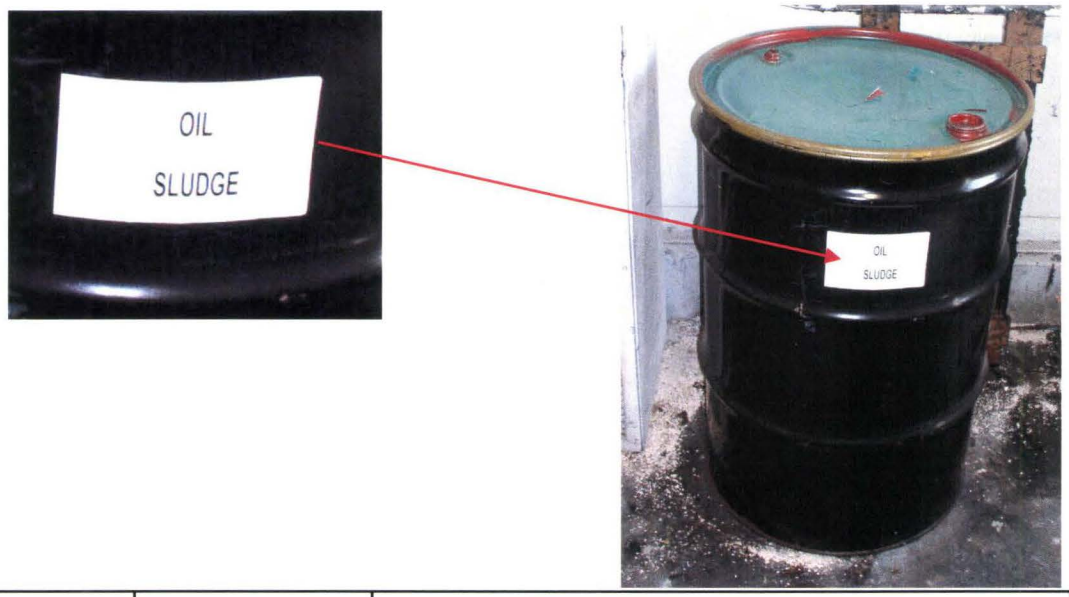
Henniges Automotive Iowa, Inc.
Keokuk, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the level gauge (see arrow) for the oil tank in the Interior Tank Farm.	23
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the four storage containers of used oil sludge in the CSA. The containers were in good condition and properly marked.	24
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

Henniges Automotive Iowa, Inc.
Keokuk, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows an example of the labeling of the containers of used oil sludge in the CSA.	25
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	



TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows used oil collection container in the Cement Building. The container was closed, in good condition, but was not marked with the words "used oil" (**NOPF No. 5**). The inset shows a blow-up of the label..	26
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

Henniges Automotive Iowa, Inc.
Keokuk, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the solvent parts washer in the tool crib area.	27
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the parts washer in the general maintenance area.	28
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

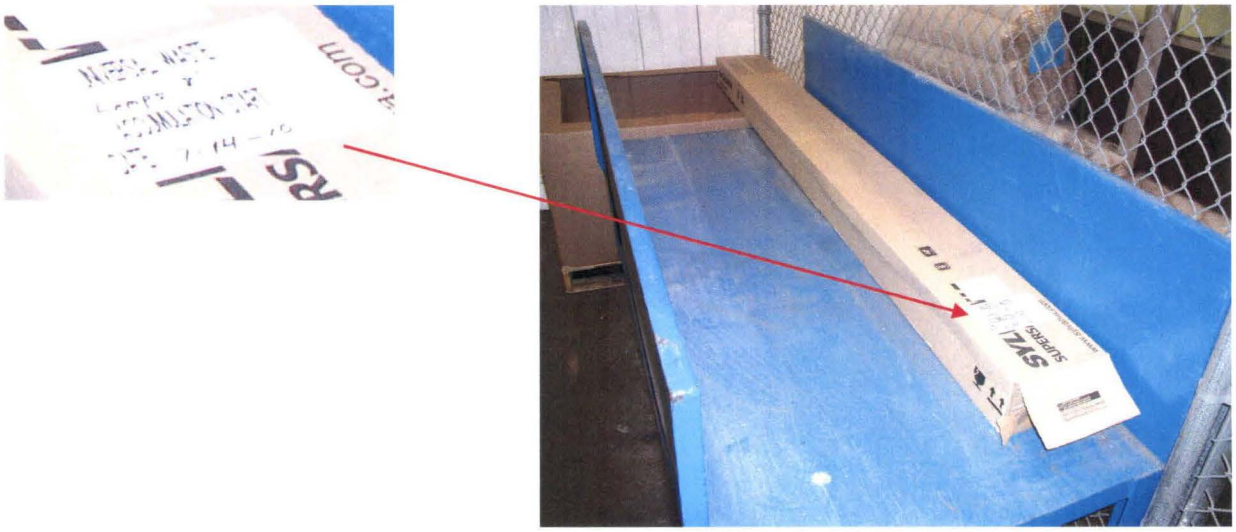
Henniges Automotive Iowa, Inc.
Keokuk, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the storage area for universal waste in the manufacturing area of the facility.	29
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a universal waste lamp storage container in the universal waste storage cage. The container was properly dated, marked, and in good condition. The inset shows a blow-up of the label.	30
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

Henniges Automotive Iowa, Inc.
Keokuk, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows universal waste lamps in a fiber drum depicted in Photograph 30 in the universal waste storage area.	31
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	



TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a universal waste lamp storage container in the universal waste storage cage. The container was properly dated, marked, and in good condition. The inset shows a blow-up of the label. The container is not considered closed because the lid is not taped shut (**NOPF No. 7**).	32
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

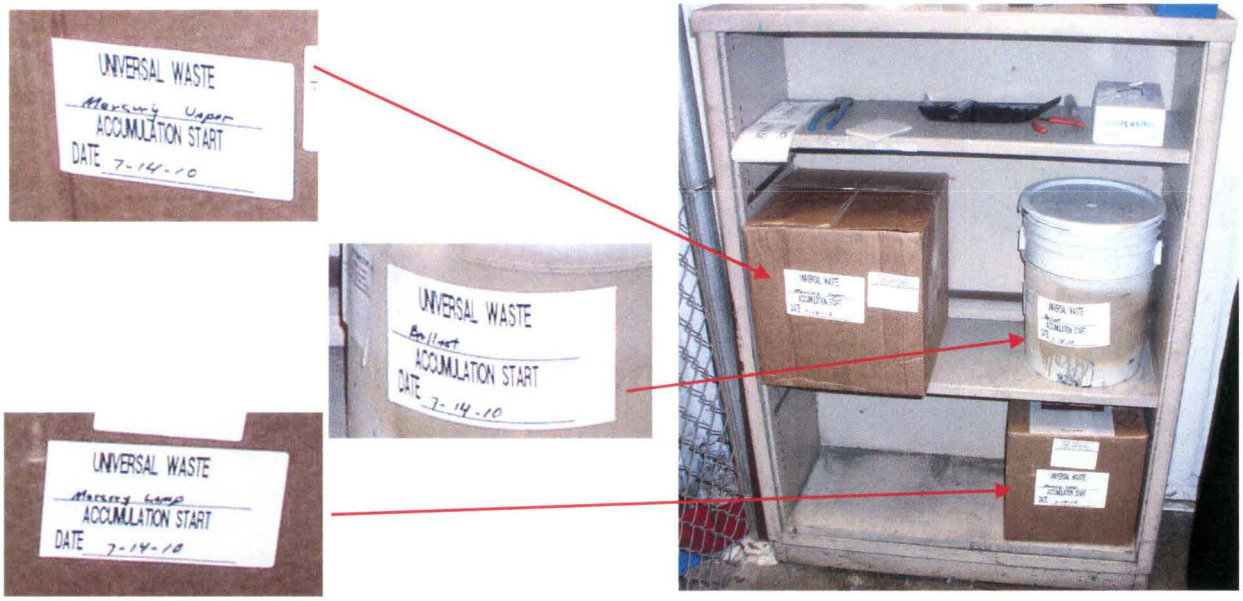
Henniges Automotive Iowa, Inc.
Keokuk, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the universal waste storage area No. 3.	33
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the storage container for universal waste lamps in storage area No. 3. The container is in good condition, properly marked and dated. The inset shows a blow-up of the label.	34
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

Henniges Automotive Iowa, Inc.
Keokuk, Iowa

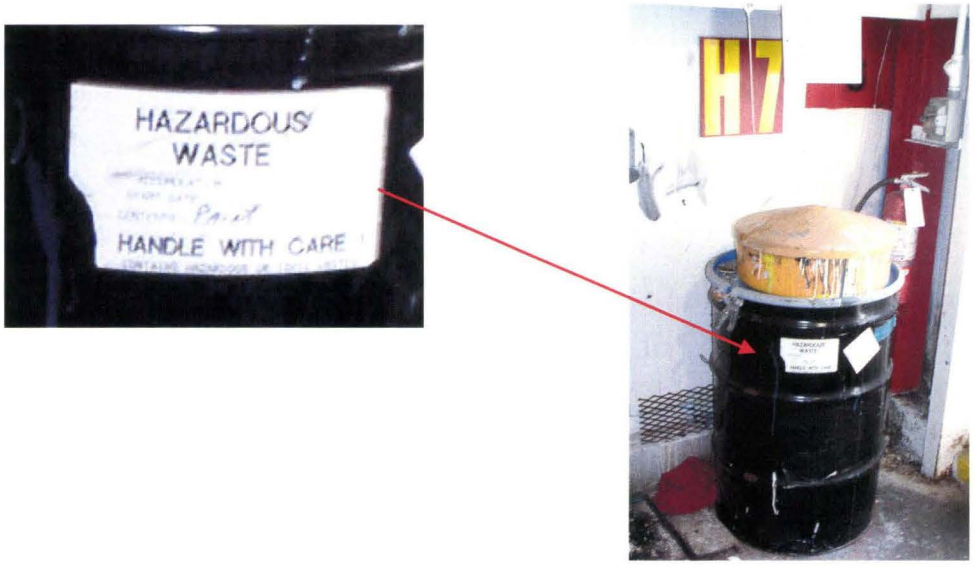
TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the storage container for universal waste lamps in storage area No. 3. The container is not considered closed because the lid is not taped shut (**NOPF No. 7**).	35
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	



TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the universal waste storage of ballasts and mercury-containing wastes in the universal waste cage area. The insets show blow-ups of the labels.	36
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

Henniges Automotive Iowa, Inc.
Keokuk, Iowa

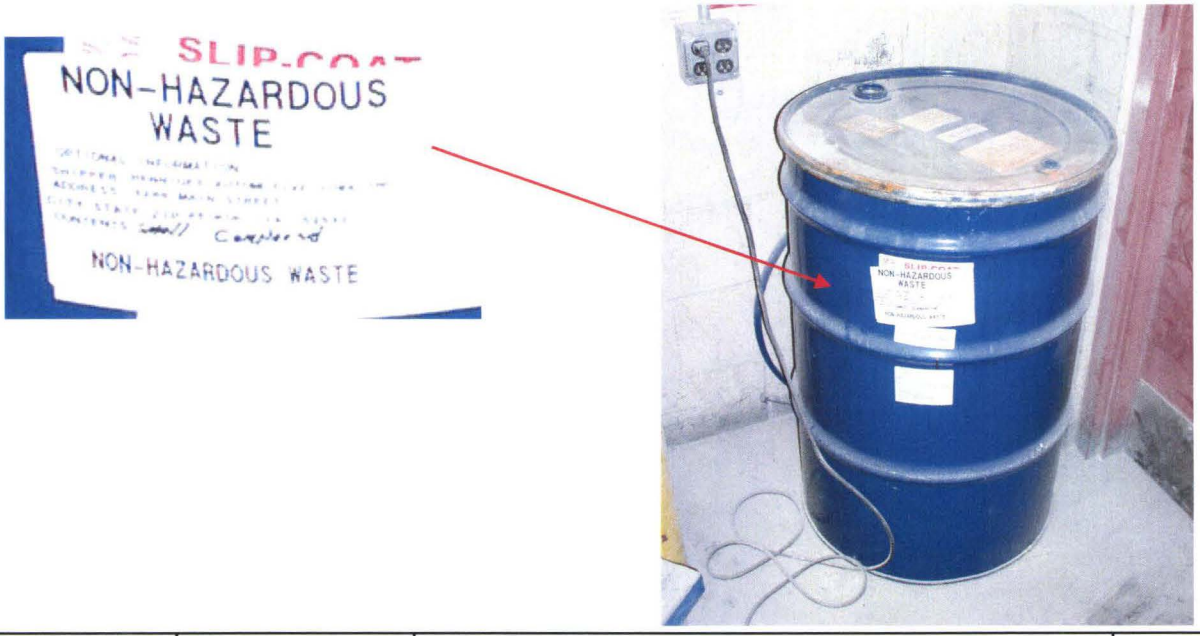
TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows spent lead-acid batteries from maintenance of electric carts and lift trucks. The batteries are returned to either O'Reilly Auto Parts or M&H Equipment for recycling.	37
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	



TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a 55-gallon container in SAA No 7 with paint waste in the Cement Building. The container was properly marked, closed, and in good condition. The inset shows a blow-up of the label.	38
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

Henniges Automotive Iowa, Inc.
Keokuk, Iowa

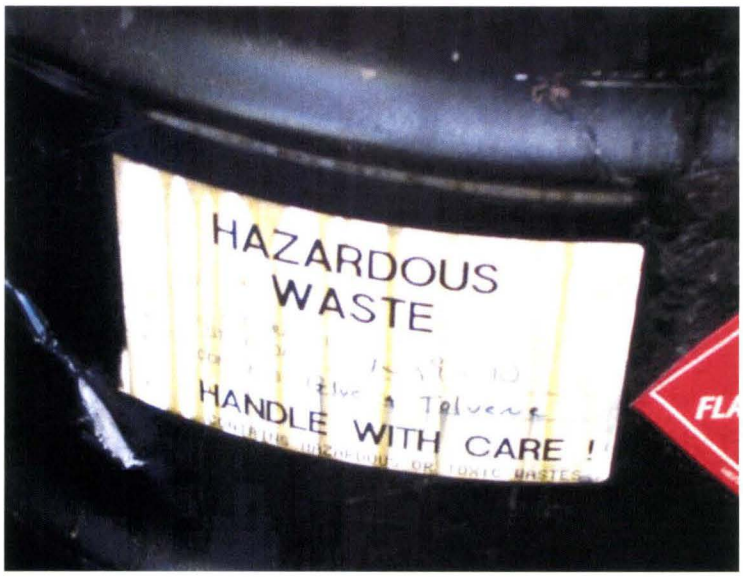
TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a typical container of scrap metal that is collected by North Cedar – South to be recycled.	39
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	



TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows a container that holds non-hazardous waste floor sweepings from the small compound area. The inset shows a blow-up of the label.	40
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

Henniges Automotive Iowa, Inc.
Keokuk, Iowa

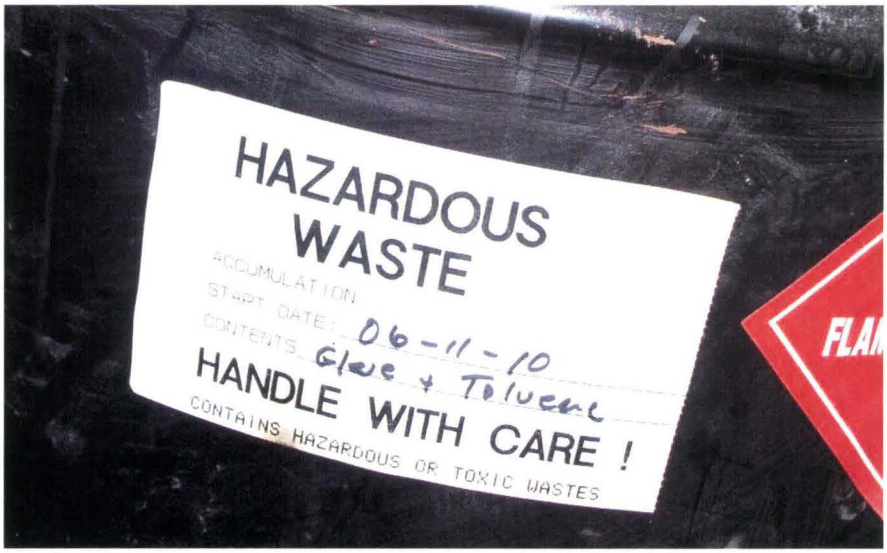
TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows three 55-gallon containers of hazardous waste in the CSA. All containers were in good shape, dated, and properly marked. These containers are also shown in Photograph Nos. 39 through 41.	41
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	



TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the hazardous waste label with accumulation date on container No. 1.	42
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

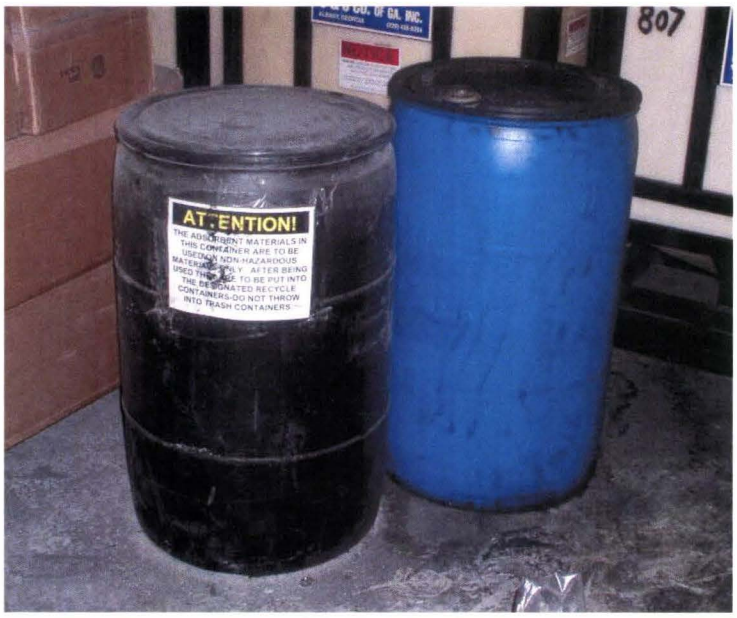
Henniges Automotive Iowa, Inc.
Keokuk, Iowa

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the hazardous waste label with accumulation date on container No. 2.	43
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	



TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the hazardous waste label with accumulation date on container No. 3.	44
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

Henniges Automotive Iowa, Inc.
Keokuk, Iowa



TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows two containers that hold absorbent material used to clean up spills of oil in the mixing area.	45
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

TETRA TECH PROJECT NO. G90220070090402	DESCRIPTION	This photograph shows the label for the containers that contain absorbent material that is used to clean up spills of oil in the mixing area.	46
	CLIENT	U.S. EPA	Date 7/20/10
	PHOTOGRAPHER	David Homer	

ATTACHMENT 9

HAZARDOUS WASTE MANIFESTS AND LAND DISPOSAL RESTRICTION NOTIFICATIONS

(14 Pages)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
IAD005136023	1	(414) 236-1020	001451456 JJK

GENERATOR

5. Generator's Name and Mailing Address
Henniges Automotive
3200 Main Street
Keokuk, IA 52632
Generator's Phone: 319 524-4560

Generator's Site Address (if different than mailing address)
Henniges Automotive
3200 Main Street
Keokuk, IA 52632

6. Transporter 1 Company Name: Badger Disposal of WI — U.S. EPA ID Number: WID988580056

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: Badger Disposal of WI, Inc.
5611 West Hemlock St.
Milwaukee, WI 53223
Facility's Phone: (414) 760-9175
U.S. EPA ID Number: WID988580056

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN1866, WASTE Resin solution, 3, PG-II	005	DM	275	G	D001		
X	2. UN 1993, Waste Flammable liquids, n.o.s, (Contains Acetone and Toluene), 3, PII	001	DM	55	G	D001	D022	
						F003	F005	
	3.							
	4.							

14. Special Handling Instructions and Additional Information
A: WS000811; Flocking Adhesive (ERG# 127)
B: WS016259, Misc Chemicals (ERG# 128)
C:
D: Bill to: HRI Consultants, Inc

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Dennis Gates — Signature — Month: 06 Day: 08 Year: 10

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: RANDY KOENLER — Signature — Month: 06 Day: 08 Year: 10

Transporter 2 Printed/Typed Name — Signature — Month — Day — Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month — Day — Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H061	H061		

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Marty Schmit — Signature — Month: 6 Day: 9 Year: 10

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. **DESIGNATED FACILITY TO GENERATOR**

Attachment C Page 1 of 19

Badger Disposal of WI., Inc.
WID988530056
5611 W. Hemlock St.
Milwaukee, WI 53223
414/760-9175 FAX: 414/760-9189

Generator Name: Henniges Industrial

EPA ID#: IAS005136023

Manifest Number: 0014512456 JJK

Hazardous Waste Restricted from Land Disposal Certification

Line item A, B (A, B, C or D) is subject to the land disposal restrictions of 40CFR Part 268. In accordance with 40CFR 268.7, this generator is providing notice that the waste does not meet the treatment standards specified in Part 268 Subpart D, or does not meet the prohibitions specified in 268.32 or RCRA section 3004 (d).

X The shipment contains F001 - F005 spent solvents (Complete Table A, page 2)

X The shipment contains other Land Disposal Restricted materials. List all US EPA hazardous waste codes that apply to this waste shipment. (Complete Table B, page 3) (D001 CMBST)

X The shipment contains F039 multi-source leachate, or D001 (DEACT), D002 (DEACT) waste prohibited under 40 CFR Section 268.37 or D012 through D043 waste prohibited under the revision to 40 CFR Section 268.48. (Complete Table B, page 3, and/or Table C, page 4)

_____ The shipment contains labpacks (Complete Table D, page 6)

Waste Management. Using the following guidelines based on 40CFR 268.7, enter the appropriate letter in the "Management" column located on Table B.

A. RESTRICTED WASTE REQUIRING FURTHER TREATMENT. This waste must be treated in the applicable treatment standards set forth in 40CFR part 266 subpart D, 268.32, or RCRA Section 3004(d). For "Hazardous Debris", this hazardous debris is subject to the alternative treatment standards of 40CFR 268.45.

B. RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS. " I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that based on my inquiry of those individuals immediately responsible for obtaining this information. I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40CFR 268 subpart D, and all applicable prohibitions set forth in 40CFR 268.32 or RCRA section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

C. RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS A SPECIFIED TECHNOLOGY AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY. " I certify under penalty of law that the waste has been treated in accordance with the requirements of 40CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

D. GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS. "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that based on my inquiry of those individuals immediately responsible for obtaining this information. I believe that the non wastewater organic constituents have been treated by incineration in units operated in accordance with 40CFR Part 264 Subpart O or 40CFR Part 265 Subpart D or by combustion in fuel substitution units in accordance with applicable technical requirements, and I have been unable to detect the non-wastewater organic constituents despite having used good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

E. RESTRICTED WASTE SUBJECT TO A VARIANCE. This waste is subject to a national capacity variance, a treatable variance, or a case - by - case extension. Enter the effective date of the prohibition in this column as well. For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40CFR Part 265.45."

F. RESTRICTED WASTE WHICH CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT. " I have determined that this waste meets all applicable treatment standards set forth in 40 CFR Part 268 Subpart D, and all applicable prohibition levels set forth in Section 268.32, or RCRA Section 3004(d), and therefore can be land disposed without further

treatment." A copy of all applicable treatment standards and specified treatment methods is maintained at the treatment, storage and disposal facility named above. " I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support the certification that the waste complies with the treatment standards specified in 40CFR Part 268 subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004 (d). I believe that the information I have submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false certification including the possibility of a fine and imprisonment."

G. WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS. This waste is a newly identified waste that is not currently subject to any 40CFR 265 restrictions.

TABLE A
Treatment Standards for F001 - F005 Spent Solvents

Waste Code	Constituents of Concern	Non-Wastewater	
		Total compostion mg/kg	TCLP mg/L
001 ☐	Carbon Tetrachloride	6	-
001 ☐	Methylene Chloride	30	-
001 ☐	Tetrachloroethylene	6	-
001 ☐	1,1,1-Trichloroethane	6	-
001 ☐	Trichloroethylene	6	-
001 ☐	1,1,2-Trichloro-1,2,2-trifluoroethane	30	-
001 ☐	Trichloromonofluoromethane	30	-
002 ☐	Chlorobenzene	6	-
002 ☐	o-dichlorobenzene	6	-
002 ☐	Methylene Chloride	30	-
002 ☐	Methylene Chloride (Pharmaceutical Industry)	-	-
002 ☐	Tetrachloroethylene	6	-
002 ☐	1,1,1-Trichloroethane	6	-
002 ☐	1,1,2-Trichloroethane	6	-
002 ☐	Trichloroethylene	6	-
002 ☐	1,1,2-Trichloro-1,2,2-trifluoroethane	30	-
002 ☐	Trichloromonofluoromethane	30	-

Waste Code	Constituents of Concern	Non-Wastewater	
		Total composition mg/kg	TCLP mg/L
F003 ☒	Acetone	160	-
F003 ☐	n-Butyl Alcohol	2.6	-
F003 ☐	Cyclohexanone		0.75
F003 ☐	Ethyl Acetate	33	-
F003 ☐	Ethyl Benzene	10	-
F003 ☐	Ethyl Ether	160	-
F003 ☐	Methanol		0.75
F003 ☐	Methyl Isobutyl Ketone	33	
F003 ☐	Xylenes (total)	30	-
F004 ☐	Cresol	5.6	-
F004 ☐	Nitrobenzene	14	-
F005 ☐	Benzene	10	-
F005 ☐	Carbon Disulfide		4.8
F005 ☐	2-Ethoxyethanol	INCIN	
F005 ☐	Isobutyl Alcohol	170	
F005 ☐	Methyl Ethyl Ketone	36	
F005 ☐	2-Nitropropane	INCIN	
F005 ☒	Pyridine	16	
F005 ☒	Toluene	10	

TABLE B

Waste Code	Non-waste water	Treatment Sub-category (if applicable, or NONE)	Technology Standards or Management (A-G based on list shown on pages 1/2)
☐ D001		Ignitable Liquids based on 40 CFR 261.21 except for the 261.21 (a)(1) High TOC Subcategory, managed in Non-CWA/Non CWA equivalent, non Class 1 SDWA Systems	DEACT & meet UTSD, or RORGS, or CMBST
☐ D001		Ignitable characteristic wastes, except for the 261.21 (a)(1) High TOC Subcategory, that are managed in CWA/CWA-equivalent Class 1 SDWA Systems.	DEACT
☒ D001	NWW	Ignitable liquids based on 40 CFR 261.2 (a)(1) High TOC Ignitable Liquid Subcategory - greater than or equal to 10% TOC	RORGS or CMBST A
☒ D022	NWW		A
☒ D038	NWW		A

TABLE C

If D001, D002, or D012 through D043 requires treatment to 268.40 standards, then each underlying hazardous constituent present in the waste at the point of generation and at a level above the UTS constituents listed treatment standard must be checked.

If D001 or D002 requires treatment of deactivation and meets F039 standards then each underlying hazardous constituent present in the waste at the point of generation and at a level above the F039 and UTS constituent listed treatment standard must be checked.

IF THERE ARE NO UTS CONSTITUENTS PRESENT IN THE WASTE UPON IT'S INITIAL GENERATION CHECK HERE ☐

Check the underlying individual constituents likely to be present from the list below:

	Regulated Constituent	WW	NWW
	Acenaphthylene	0.059	3.4
	acenaphthene	0.059	3.4
	Acetone	0.28	160
	Acetonitrile	5.6	1.8[2]
	Acetophenone	0.010	9.7
	2-Acetylaminofluorene	0.059	140
	Acrolein	0.29	NA
	Acrylamide	19[2]	23[2]
	Acrylonitrile	0.24	84
	Aldrin	0.021	0.066
	4-Aminobiphenyl	0.13	NA
	Aniline	0.81	14
	Anthracene	0.059	3.4
	Aramite	0.36	NA
	alpha-BHC	0.00014	0.066
	beta-BHC	0.00014	0.066
	delta-BHC	0.023	0.066
	gamma-BHC (Lindane)	0.00017	0.066
	Benzene	0.14	10
	Benz (a) anthracene	0.059	3.4
	Benzal chloride	0.055[2]	60[2]
	Benzo (b) fluoranthene	0.11	68
	Benzo (k) fluoranthene	0.11	68
	Benzo (g,h,i,) perylene	0.0055	18
	Benzo (a) pyrene	0.061	34
	Bromodichloromethane	0.35	15
	Bromoform (Tribromomethane)	0.63	15
	Bromomethane (methyl bromide)	0.11	15
	4-Bromophenyl phenyl ether	0.0055	15
	n-Butanol (n-butyl alcohol)	5.6	2.6
	Butyl benzyl phthalate	0.017	28
	2-sec Butyl 4,6 dinitrophenol (Dinoseb)	0.066	2.5
	Carbon Disulfide	3.8	1.8[1,2]
	Carbon Tetrachloride	0.057	6.0
	o-Dichlorobenzene	0.088	6.0
	p-Dichlorobenzene	0.090	6.0
	Dichlorodifluoromethane	0.23	7.2
	1,1-Dichloroethane	0.59	6.0
	1,2-Dichloroethane	0.21	6.0
	1,1-Dichloroethylene	0.025	6.0
	trans-1,2-Dichloroethylene	0.054	30
	2,4-Dichlorophenol	0.044	14
	2,6-Dichlorophenol	0.044	14
	1,2-Dichloropropane	0.85	18
	cis-1,3-Cichloropropylene	0.036	18
	trans-1,3-Dichloropropylene	0.036	18
	Dieldrin	0.017	0.13
	Diethyl phthalate	0.20	28
	p-Dimethylaminoazobenzene	0.13	NA
	2,4-Dimethyl Phenol	0.036	14
	Dimethyl Phthalate	0.047	28

	Regulated Constituent	WW	NWW
	chlordane (alpha & gamma)	0.0033	0.26
	p-Chloroaniline	0.46	16
	Chlorobenzene	0.057	6.0
	Chlorobenzilate	0.10	NA
	2-chloro-1,3 butadiene	0.057	0.28[2]
	Chlorodibromomethane	0.27	15
	Chloroethane	0.036	6.0
	bis-(2-Chloroethoxy) methane	0.033	7.2
	bis-(2-Chloroethyl) ether	0.033	6.0
☒	Chloroform	0.046	6.0
	bis-(2-Chloroisopropyl) ether	0.055	6.0
	p-Chloro-m-cresol	0.018	14
	2-Chloroethyl Vinyl ether	0.062[2]	NA[2]
	Chloromethane (methyl chloride)	0.19	30
	2-Chloronaphthalene	0.055	5.6
	2-Chlorophenol	0.044	5.7
	3-Chloropropylene	0.036	30
	Chrysene	0.059	3.4
	o-Cresol	0.11	5.6
	Cresol (m- and p- isomers)	0.77	5.6
	Cyclohexanone	0.36	0.75[2]
	1,2-Dibromo-3-Chloropropane	0.11	15
	1,2-Dibromoethane (Ethylene dibromide)	0.028	15
	Dibromomethane	0.11	15
	2,4-Dichlorophenoxyacetic acid (2,4-D)	0.72	10
	o,p,DDD	0.023	0.087
	p,p-DDD	0.023	0.087
	o,p-DDE	0.031	0.087
	p,p-DDE	0.031	0.087
	o,p-DDT	0.0039	0.087
	p,p-DDT	0.0039	0.087
	Dibenz (a,h) anthracene	0.055	8.2
	Dibenz (a,e) pyrene	0.061	NA
	m-Dichlorobenzene	0.036	6.0
	Fluoranthene	0.068	3.4
	Fluorene	0.059	3.4
	Heptachlor	0.0012	0.066
	Heptachlor epoxide	0.016	0.066
	Hexachlorobenzene	0.055	10
	Hexachlorobutadiene	0.055	5.6
	Hexachlorocyclopentadiene	0.057	2.4
	Hexachlorodibenzo-furans	0.000063	0.001
	Hexachlorodibenzo-p-dioxins	0.000063	0.001
	Hexachloroethane	0.055	30
	Hexachloropropylene	0.035	30
	Indeno (1,2,3-c,d) pyrene	0.0055	3.4
	Iodomethane	0.19	65
	Isobutanol (Isobutyl Alcohol)	5.6	170
	Isodrin	0.021	0.066
	Isosafrole	0.081	2.6
	Kepone	0.0011	0.13

Regulated Constituent	WW	NWW
Di-n-butyl Phthalate	0.057	28
1,4-Dinitrobenzene	0.32	2.3
4,6-Dinitro-o-cresol	0.28	160
2,4-Dinitrophenol	0.12	160
2,4-Dinitrotoluene	0.32	140
2,6-Dinitrotoluene	0.55	28
Di-n-octyl phthalate	0.017	28
Di-n-propylnitrosoamine	0.40	14
1,4-Dioxane	NA	170
Diphenylamine [4]	0.92	13 [3]
Diphenylnitrosoamine [4]	0.92	13 [3]
1,2-Diphenyl hydrazine	0.087	NA
Disulfoton	0.017	6.2
Endosulfan I	0.023	0.066
Endosulfan II	0.029	0.13
Endosulfan sulfate	0.029	0.13
Endrin	0.0028	0.13
Endrin aldehyde	0.025	0.13
Ethyl acetate	0.34	33
Ethyl benzene	0.057	10
Ethyl cyanide (Propanenitrile)	0.24	360
Ethyl ether	0.12	160
bis-(2-Ethylhexyl) phthalate	0.28	28
Ethyl methacrylate	0.14	160
Ethylene oxide	0.12	NA
Famphur	0.017	15
N-Nitrosopyrrolidine	0.013	35
Parathion	0.014	4.6
PCB's (Total all isomers or Aroclors)	0.10	10
Pentachlorobenzene	0.55	10
Pentachloroethane	0.55 [2]	6.0 [2]
Pentachlorodibenzo-furans	0.000035	0.001
Pentachlorodibenzo-p-dioxins	0.000063	0.001
Pentachloronitrobenzene	0.055	4.8
Pentachlorophenol	0.089	7.4
Phenacetin	0.081	16
Phenanthrene	0.059	5.6
Phenol	0.039	6.2
Phorate	0.021	4.6
Phthalic acid	0.55 [2]	28 [2]
Phthalic anhydride	0.055	28 [2]
Pronamide	0.93	15
Pyrene	0.067	82
Pyridine	0.014	16
Safrole	0.081	22
Silvex (2,4,5-TP)	0.72	79
2,4,5-T	0.72	79
1,2,4,5-Tetrachlorobenzene	0.055	14
Tetrachlorodibenzo-furans	0.000063	0.001
Tetrachlorodibenzo-p-dioxins	0.000063	0.001
1,1,1,2-Tetrachloroethane	0.057	6.0
1,1,2,2-Tetrachloroethane	0.057	6.0
Tetrachloroethylene	0.056	6.0
2,3,4,6-Tetrachlorophenol	0.030	7.4
Toluene	0.80	10
Toxaphene	0.0095	2.6

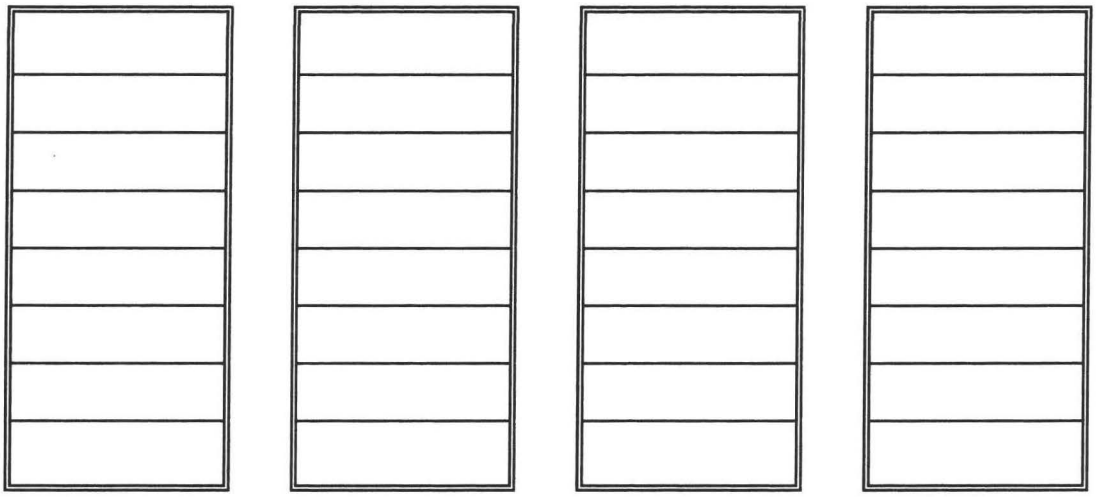
	Regulated Constituent	WW	NWW
	Methacrylonitrile	0.24	84
☒	Methanol	5.6	0.75 [1,2]
	Methapyrilene	0.081	1.5
	Methoxychlor	0.25	0.18
	3-Methylcholanthrene	0.0055	15
	4,4-Methylene-bis-(2-chloroaniline)	0.50	30
	Methylene chloride	0.089	30
	Methyl Ethyl Ketone	0.28	36
	Methyl isobutyl ketone	0.14	33
	Methyl methacrylate	0.14	160
	Methyl methanesulfonate	0.018	NA
	Methyl parathion	0.014	4.6
	Naphthalene	0.059	5.6
	2-Naphthylamine	0.52	NA
	o-Nitroaniline	0.27 [2]	14 [2]
	p-Nitroaniline	0.028	28
	Nitrobenzene	0.068	14
	5-Nitro-o-toluidine	0.32	28
	o-Nitrophenol	0.028 [2]	13 [2]
	p-Nitrophenol	0.12	29
	N-Nitrosodiethylamine	0.40	28
	N-Nitrosodimethylamine	0.40	2.3 [2]
	N-Nitroso-di-n-butylamine	0.40	17
	N-Nitrosomethylethylamine	0.40	2.3
	N-Nitrosomorpholine	0.40	2.3
	N-Nitrosopiperidine	0.013	35
	1,2,4-Trichlorobenzene	0.55	19
	1,1,1-Trichloroethane	0.054	6.0
	1,1,2-Trichloroethane	0.054	6.0
	Trichloroethylene	0.054	6.0
	Trichloromonofluoromethane	0.020	30
	2,4,5-Trichlorophenol	0.18	7.4
	2,4,6-Trichlorophenol	0.035	7.4
	1,2,3-Trichloropropane	0.85	30
	1,1,2-Trichloro-1,2,2-trifluorethane	0.057	30
	Tris-(2,3-dibromopropyl)phosphate	0.11	0.10 [2]
	Vinyl chloride	0.27	6.0
	Xylene (sum of o-, m-, and p-isomers)	0.32	30
	Cyanides (Total)	1.2	590
	Cyanides (Amenable)	0.86	30 [1]
	Arsenic	1.4	5.0 [1]
	Barium	1.2	7.6 [1]
	Beryllium	0.82	0.014 [1,2]
	Cadmium	0.69	0.19 [1]
	Chromium (Total)	2.77	0.86 [1]
	Fluoride	35	NA
	Lead	0.69	0.37 [1]
	Mercury (Not from Retorting)	0.15	0.025 [1]
	Antimony	1.9	2.1 [1]
	Nickel	3.98	5.0 [1]
	Selenium	0.82	0.16 [1]
	Silver	0.43	0.30 [1]
	Sulfide	14	NA
	Thallium	1.4	0.078 [1,2]
	Vanadium	4.3	0.23 [1,2]
	Zinc	2.61 [3]	NA

1. These concentrations are expressed in mg/L and are measured through an analysis of TCLP extract; all others are measured through a total waste analysis.
2. These constituents are only applicable as Underlying Hazardous Constituents. They are not constituents requiring treatment in F039 wastes.
3. Zinc is not an Underlying Hazardous Constituent requiring treatment in D001, D002, or D012-D043 wastes.
4. These compounds are regulated by the sum of their concentration instead of as individual constituents.

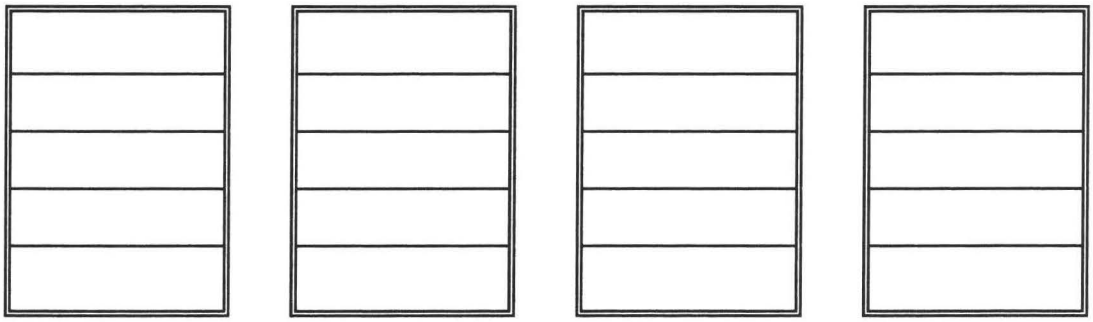
NOTE: Wastewater units are in mg/L, non-wastewater are in mg/Kg.

TABLE D
LAB PACK CERTIFICATION
(268.42, Appendix iv)

1. APPENDIX IV DRUMS:
This notification and certification applies to the following drums on this shipment. List the Lab Pack drum identification numbers below:



2. ALL DRUMS THAT MAY NOT BE PACKAGED AS APPENDIX IV TYPE LABPACKS:
The US EPA Hazardous waste codes are **D009, F019, K003, K004, K005, K006, K062, K071, K100, K106, P010, P011, P012, P076, P078, U134, U151.** The alternative treatment standard is incineration (INCIN). This notification applies to those wastes in the following drums on this shipment. List the Lab Pack drum identification numbers below:



CERTIFICATION:

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support the certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I have submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false certification, including the possibility of a fine and imprisonment.

I hereby certify that all information in this and all associated documents is complete and accurate to the best of my knowledge and information has all the necessary permits and licenses for the waste that has been identified by the profile, if approved for management.

Authorized Representative Signature: _____

Print or Type Name: Dennis Gates

Title: Hazardous Waste Handler **Date:** 06/08/10

N:\USER\FORMS\BLANKS\LAND_BAN.4

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: IAD005138023
2. Page 1 of: 1
3. Emergency Response Phone: (414) 228-1080
4. Manifest Tracking Number: 001451375 JJK

GENERATOR

5. Generator's Name and Mailing Address: Hennigee Automotive, 3200 Main Street, Keokuk, IA 52632
Generator's Phone: 319 524 4560
Generator's Site Address (if different than mailing address): Hennigee Automotive Profile System, 3200 Main Street, Keokuk IA 52632

6. Transporter 1 Company Name: ENVIROVAC WASTE TRANSPORT SYSTEMS
U.S. EPA ID Number: I L R 0 0 0 0 1 3 5 8 3

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Badger Disposal of WI., Inc, 5811 W. Hemlock Street, Milwaukee, WI 53223
Facility's Phone: (414) 760-0175
U.S. EPA ID Number: W I D 9 8 8 5 8 0 0 5 8

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN1268, WASTE Resin solution, flammable, 3, PG-II	1	DM	55	G	D001
X	2. UN1325, Waste, Hexamethylenetetramine, 1.1, PG II	1	DM	11	P	D001
	3.					
	4.					

14. Special Handling Instructions and Additional Information
A: MSD00811:20031467,Flocking Adhesive,(ERG#127)
B: MSD18951: Rheosin A 4B (ERG#133)
C:
D:
Bill to: HMI Consultants

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: D. Mike Gates
Signature:
Month: 03 Day: 03 Year: 09

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: James Fitzsimmons
Signature:
Month: 03 Day: 03 Year: 09

Transporter 2 Printed/Typed Name:
Signature:
Month: Day: Year:

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H061	H141		

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Martin W. Schmidt
Signature:
Month: 3 Day: 5 Year: 09

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. **DESIGNATED FACILITY TO GENERATOR**

Attachment 1 Page 6 of 14

Badger Disposal of WI, Inc.
WID988580056
5611 W. Hemlock St.
Milwaukee, WI 53223
414/760-9175 FAX: 414/760-9189

Generator Name: Henniges Industrial

EPA ID#: IAS005136023

Manifest Number: 001451375 JJK

Hazardous Waste Restricted from Land Disposal Certification

Line item ___A, B___ (A, B, C or D) is subject to the land disposal restrictions of 40CFR Part 268. In accordance with 40CFR 268.7, this generator is providing notice that the waste does not meet the treatment standards specified in Part 268 Subpart D, or does not meet the prohibitions specified in 268.32 or RCRA section 3004 (d).

_____ The shipment contains F001 - F005 spent solvents (Complete Table A, page 2)

___X___ The shipment contains other Land Disposal Restricted materials. List all US EPA hazardous waste codes that apply to this waste shipment. (Complete Table B, page 3) (D001 CMBST)

___X___ The shipment contains F039 multi-source leachate, or D001 (DEACT), D002 (DEACT) waste prohibited under 40 CFR Section 268.37 or D012 through D043 waste prohibited under the revision to 40 CFR Section 268.48. (Complete Table B, page 3, and/or Table C, page 4)

_____ The shipment contains labpacks (Complete Table D, page 6)

Waste Management. Using the following guidelines based on 40CFR 268.7, enter the appropriate letter in the "Management" column located on Table B.

A. RESTRICTED WASTE REQUIRING FURTHER TREATMENT. This waste must be treated in the applicable treatment standards set forth in 40CFR part 266 subpart D, 268.32, or RCRA Section 3004(d). For "Hazardous Debris", this hazardous debris is subject to the alternative treatment standards of 40CFR 268.45.

B. RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS. " I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that based on my inquiry of those individuals immediately responsible for obtaining this information. I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40CFR 268 subpart D, and all applicable prohibitions set forth in 40CFR 268.32 or RCRA section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

C. RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS A SPECIFIED TECHNOLOGY AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY. " I certify under penalty of law that the waste has been treated in accordance with the requirements of 40CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

D. GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS. "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that based on my inquiry of those individuals immediately responsible for obtaining this information. I believe that the non wastewater organic constituents have been treated by incineration in units operated in accordance with 40CFR Part 264 Subpart O or 40CFR Part 265 Subpart D or by combustion in fuel substitution units in accordance with applicable technical requirements, and I have been unable to detect the non-wastewater organic constituents despite having used good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

E. RESTRICTED WASTE SUBJECT TO A VARIANCE. This waste is subject to a national capacity variance, a treatable variance, or a case - by - case extension. Enter the effective date of the prohibition in this column as well. For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40CFR Part 265.45."

F. RESTRICTED WASTE WHICH CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT. " I have determined that this waste meets all applicable treatment standards set forth in 40 CFR Part 268 Subpart D, and all applicable prohibition levels set forth in Section 268.32, or RCRA Section 3004(d), and therefore can be land disposed without further

treatment." A copy of all applicable treatment standards and specified treatment methods is maintained at the treatment, storage and disposal facility named above. " I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support the certification that the waste complies with the treatment standards specified in 40CFR Part 268 subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004 (d). I believe that the information I have submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false certification including the possibility of a fine and imprisonment."

G. WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS. This waste is a newly identified waste that is not currently subject to any 40CFR 265 restrictions.

TABLE A
Treatment Standards for F001 - F005 Spent Solvents

Waste Code	Constituents of Concern	Non-Wastewater	
		Total compostion mg/kg	TCLP mg/L
F001 ☐	Carbon Tetrachloride	6	-
F001 ☐	Methylene Chloride	30	-
F001 ☐	Tetrachloroethylene	6	-
F001 ☐	1,1,1-Trichloroethane	6	-
F001 ☐	Trichloroethylene	6	-
F001 ☐	1,1,2-Trichloro-1,2,2-trifluoroethane	30	-
F001 ☐	Trichloromonofluoromethane	30	-
F002 ☐	Chlorobenzene	6	-
F002 ☐	o-dichlorobenzene	6	-
F002 ☐	Methylene Chloride	30	-
F002 ☐	Methylene Chloride (Pharmaceutical Industry)	-	-
F002 ☐	Tetrachloroethylene	6	-
F002 ☐	1,1,1-Trichloroethane	6	-
F002 ☐	1,1,2-Trichloroethane	6	-
F002 ☐	Trichloroethylene	6	-
F002 ☐	1,1,2-Trichloro-1,2,2-trifluoroethane	30	-
F002 ☐	Trichloromonofluoromethane	30	-

Waste Code	Constituents of Concern	Non-Wastewater	
		Total composition mg/kg	TCLP mg/L
F003 ☐	Acetone	160	-
F003 ☐	n-Butyl Alcohol	2.6	-
F003 ☐	Cyclohexanone		0.75
F003 ☐	Ethyl Acetate	33	-
F003 ☐	Ethyl Benzene	10	-
F003 ☐	Ethyl Ether	160	-
F003 ☐	Methanol		0.75
F003 ☐	Methyl Isobutyl Ketone	33	
F003 ☐	Xylenes (total)	30	-
F004 ☐	Cresol	5.6	-
F004 ☐	Nitrobenzene	14	-
F005 ☐	Benzene	10	-
F005 ☐	Carbon Disulfide		4.8
F005 ☐	2-Ethoxyethanol	INCIN	
F005 ☐	Isobutyl Alcohol	170	
F005 ☐	Methyl Ethyl Ketone	36	
F005 ☐	2-Nitropropane	INCIN	
F005 ☐	Pyridine	16	
F005 ☐	Toluene	10	

TABLE B

Waste Code	Non-waste water	Treatment Sub-category (if applicable, or NONE)	Technology Standards or Management (A-G based on list shown on pages 1/2)
☐ D001		Ignitable Liquids based on 40 CFR 261.21 except for the 261.21 (a)(1) High TOC Subcategory, managed in Non-CWA/Non CWA equivalent, non Class 1 SDWA Systems	DEACT & meet UTSD, or RORGS, or CMBST
☐ D001		Ignitable characteristic wastes, except for the 261.21 (a)(1) High TOC Subcategory, that are managed in CWA/CWA-equivalent Class 1 SDWA Systems.	DEACT
☒ D001	NWW	Ignitable liquids based on 40 CFR 261.2 (a)(1) High TOC Ignitable Liquid Subcategory - greater than or equal to 10% TOC	RORGS or CMBST A

TABLE C

If D001, D002, or D012 through D043 requires treatment to 268.40 standards, then each underlying hazardous constituent present in the waste at the point of generation and at a level above the UTS constituents listed treatment standard must be checked.

If D001 or D002 requires treatment of deactivation and meets F039 standards then each underlying hazardous constituent present in the waste at the point of generation and at a level above the F039 and UTS constituent listed treatment standard must be checked.

IF THERE ARE NO UTS CONSTITUENTS PRESENT IN THE WASTE UPON IT'S INITIAL GENERATION CHECK HERE ☐

Check the underlying individual constituents likely to be present from the list below:

	Regulated Constituent	WW	NWW
	Acenaphthylene	0.059	3.4
	acenaphthene	0.059	3.4
	Acetone	0.28	160
	Acetonitrile	5.6	1.8[2]
	Acetophenone	0.010	9.7
	2-Acetylaminofluorene	0.059	140
	Acrolein	0.29	NA
	Acrylamide	19[2]	23[2]
	Acrylonitrile	0.24	84
	Aldrin	0.021	0.066
	4-Aminobiphenyl	0.13	NA
	Aniline	0.81	14
	Anthracene	0.059	3.4
	Aramite	0.36	NA
	alpha-BHC	0.00014	0.066
	beta-BHC	0.00014	0.066
	delta-BHC	0.023	0.066
	gamma-BHC (Lindane)	0.00017	0.066
	Benzene	0.14	10
	Benz (a) anthracene	0.059	3.4
	Benzal chloride	0.055[2]	60[2]
	Benzo (b) fluoranthene	0.11	68
	Benzo (k) fluoranthene	0.11	68
	Benzo (g,h,i,) perylene	0.0055	18
	Benzo (a) pyrene	0.061	34
	Bromodichloromethane	0.35	15
	Bromoform (Tribromomethane)	0.63	15
	Bromomethane (methyl bromide)	0.11	15
	4-Bromophenyl phenyl ether	0.0055	15
	n-Butanol (n-butyl alcohol)	5.6	2.6
	Butyl benzyl phthalate	0.017	28
	2-sec Butyl 4,6 dinitrophenol (Dinoseb)	0.066	2.5
	Carbon Disulfide	3.8	1.8[1,2]
	Carbon Tetrachloride	0.057	6.0
	o-Dichlorobenzene	0.088	6.0
	p-Dichlorobenzene	0.090	6.0
	Dichlorodifluoromethane	0.23	7.2
	1,1-Dichloroethane	0.59	6.0
	1,2-Dichloroethane	0.21	6.0
	1,1-Dichloroethylene	0.025	6.0
	trans-1,2-Dichloroethylene	0.054	30
	2,4-Dichlorophenol	0.044	14
	2,6-Dichlorophenol	0.044	14
	1,2-Dichloropropane	0.85	18
	cis-1,3-Cichloropropylene	0.036	18
	trans-1,3-Dichloropropylene	0.036	18
	Dieldrin	0.017	0.13
	Diethyl phthalate	0.20	28
	p-Dimethylaminoazobenzene	0.13	NA
	2,4-Dimethyl Phenol	0.036	14
	Dimethyl Phthalate	0.047	28
	Di-n-butyl Phthalate	0.057	28
	1,4-Dinitrobenzene	0.32	2.3

	Regulated Constituent	WW	NWW
	chlordane (alpha & gamma)	0.0033	0.26
	p-Chloroaniline	0.46	16
	Chlorobenzene	0.057	6.0
	Chlorobenzilate	0.10	NA
	2-chloro-1,3 butadiene	0.057	0.28[2]
	Chlorodibromomethane	0.27	15
	Chloroethane	0.036	6.0
	bis-(2-Chloroethoxy) methane	0.033	7.2
	bis-(2-Chloroethyl) ether	0.033	6.0
	Chloroform	0.046	6.0
	bis-(2-Chloroisopropyl) ether	0.055	6.0
	p-Chloro-m-cresol	0.018	14
	2-Chloroethyl Vinyl ether	0.062[2]	NA[2]
	Chloromethane (methyl chloride)	0.19	30
	2-Chloronaphthalene	0.055	5.6
	2-Chlorophenol	0.044	5.7
	3-Chloropropylene	0.036	30
	Chrysene	0.059	3.4
	o-Cresol	0.11	5.6
	Cresol (m- and p- isomers)	0.77	5.6
	Cyclohexanone	0.36	0.75[2]
	1,2-Dibromo-3-Chloropropane	0.11	15
	1,2-Dibromoethane (Ethylene dibromide)	0.028	15
	Dibromomethane	0.11	15
	2,4-Dichlorophenoxyacetic acid (2,4-D)	0.72	10
	o,p-DDD	0.023	0.087
	p,p-DDD	0.023	0.087
	o,p-DDE	0.031	0.087
	p,p-DDE	0.031	0.087
	o,p-DDT	0.0039	0.087
	p,p-DDT	0.0039	0.087
	Dibenz (a,h) anthracene	0.055	8.2
	Dibenz (a,e) pyrene	0.061	NA
	m-Dichlorobenzene	0.036	6.0
	Fluoranthene	0.068	3.4
	Fluorene	0.059	3.4
	Heptachlor	0.0012	0.066
	Heptachlor epoxide	0.016	0.066
	Hexachlorobenzene	0.055	10
	Hexachlorobutadiene	0.055	5.6
	Hexachlorocyclopentadiene	0.057	2.4
	Hexachlorodibenzo-furans	0.000063	0.001
	Hexachlorodibenzo-p-dioxins	0.000063	0.001
	Hexachloroethane	0.055	30
	Hexachloropropylene	0.035	30
	Indeno (1,2,3-c,d) pyrene	0.0055	3.4
	Iodomethane	0.19	65
	Isobutanol (Isobutyl Alcohol)	5.6	170
	Isodrin	0.021	0.066
	Isosafrole	0.081	2.6
	Kepone	0.0011	0.13
	Methacrylonitrile	0.24	84
	Methanol	5.6	0.75[1,2]

Regulated Constituent	WW	NWW
4,6-Dinitro-o-cresol	0.28	160
2,4-Dinitrophenol	0.12	160
2,4-Dinitrotoluene	0.32	140
2,6-Dinitrotoluene	0.55	28
Di-n-octyl phthalate	0.017	28
Di-n-propylnitrosoamine	0.40	14
1,4-Dioxane	NA	170
Diphenylamine [4]	0.92	13 [3]
Diphenylnitrosoamine [4]	0.92	13 [3]
1,2-Diphenyl hydrazine	0.087	NA
Disulfoton	0.017	6.2
Endosulfan I	0.023	0.066
Endosulfan II	0.029	0.13
Endosulfan sulfate	0.029	0.13
Endrin	0.0028	0.13
Endrin aldehyde	0.025	0.13
Ethyl acetate	0.34	33
Ethyl benzene	0.057	10
Ethyl cyanide (Propanenitrile)	0.24	360
Ethyl ether	0.12	160
bis-(2-Ethylhexyl) phthalate	0.28	28
Ethyl methacrylate	0.14	160
Ethylene oxide	0.12	NA
Famphur	0.017	15
N-Nitrosopyrrolidine	0.013	35
Parathion	0.014	4.6
PCB's (Total all isomers or Aroclors)	0.10	10
Pentachlorobenzene	0.55	10
Pentachloroethane	0.55 [2]	6.0 [2]
Pentachlorodibenzo-furans	0.000035	0.001
Pentachlorodibenzo-p-dioxins	0.000063	0.001
Pentachloronitrobenzene	0.055	4.8
Pentachlorophenol	0.089	7.4
Phenacetin	0.081	16
Phenanthrene	0.059	5.6
Phenol	0.039	6.2
Phorate	0.021	4.6
Phthalic acid	0.55 [2]	28 [2]
Phthalic anhydride	0.055	28 [2]
Pronamide	0.93	15
Pyrene	0.067	82
Pyridine	0.014	16
Safrole	0.081	22
Silvex (2,4,5-TP)	0.72	79
2,4,5-T	0.72	79
1,2,4,5-Tetrachlorobenzene	0.055	14
Tetrachlorodibenzo-furans	0.000063	0.001
Tetrachlorodibenzo-p-dioxins	0.000063	0.001
1,1,1,2-Tetrachloroethane	0.057	6.0
1,1,2,2-Tetrachloroethane	0.057	6.0
Tetrachloroethylene	0.056	6.0
2,3,4,6-Tetrachlorophenol	0.030	7.4
Toluene	0.80	10
Toxaphene	0.0095	2.6

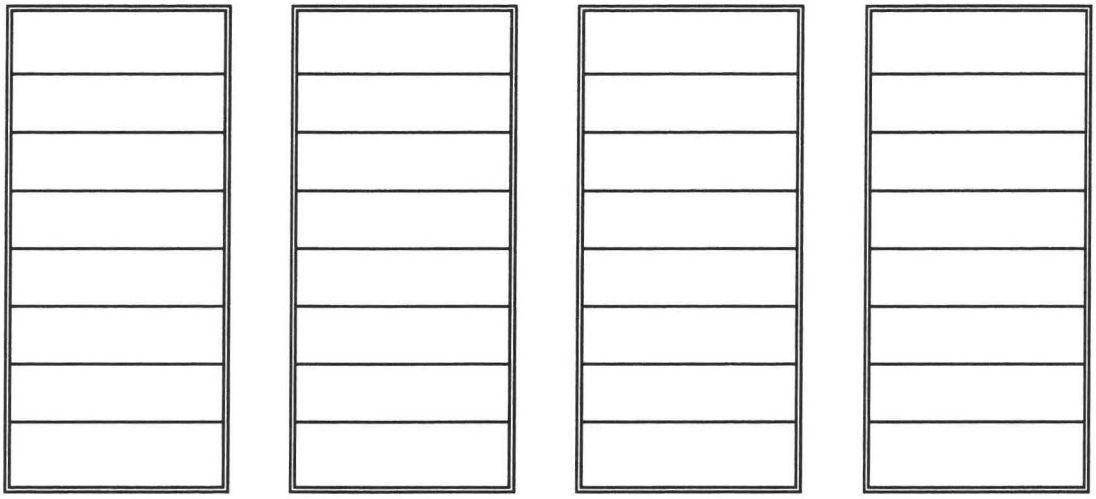
Regulated Constituent	WW	NWW
Methaprylene	0.081	1.5
Methoxychlor	0.25	0.18
3-Methylcholanthrene	0.0055	15
4,4-Methylene-bis-(2-chloroaniline)	0.50	30
Methylene chloride	0.089	30
Methyl Ethyl Ketone	0.28	36
Methyl isobutyl ketone	0.14	33
Methyl methacrylate	0.14	160
Methyl methanesulfonate	0.018	NA
Methyl parathion	0.014	4.6
Naphthalene	0.059	5.6
2-Naphthylamine	0.52	NA
o-Nitroaniline	0.27 [2]	14 [2]
p-Nitroaniline	0.028	28
Nitrobenzene	0.068	14
5-Nitro-o-toluidine	0.32	28
o-Nitrophenol	0.028 [2]	13 [2]
p-Nitrophenol	0.12	29
N-Nitrosodiethylamine	0.40	28
N-Nitrosodimethylamine	0.40	2.3 [2]
N-Nitroso-di-n-butylamine	0.40	17
N-Nitrosomethylethylamine	0.40	2.3
N-Nitrosomorpholine	0.40	2.3
N-Nitrosopiperidine	0.013	35
1,2,4-Trichlorobenzene	0.55	19
1,1,1-Trichloroethane	0.054	6.0
1,1,2-Trichloroethane	0.054	6.0
Trichloroethylene	0.054	6.0
Trichloromonofluoromethane	0.020	30
2,4,5-Trichlorophenol	0.18	7.4
2,4,6-Trichlorophenol	0.035	7.4
1,2,3-Trichloropropane	0.85	30
1,1,2-Trichloro-1,2,2-trifluorethane	0.057	30
Tris-(2,3-dibromopropyl)phosphate	0.11	0.10 [2]
Vinyl chloride	0.27	6.0
Xylene (sum of o-, m-, and p-isomers)	0.32	30
Cyanides (Total)	1.2	590
Cyanides (Amenable)	0.86	30 [1]
Arsenic	1.4	5.0 [1]
Barium	1.2	7.6 [1]
Beryllium	0.82	0.014 [1,2]
Cadmium	0.69	0.19 [1]
Chromium (Total)	2.77	0.86 [1]
Fluoride	35	NA
Lead	0.69	0.37 [1]
Mercury (Not from Retorting)	0.15	0.025 [1]
Antimony	1.9	2.1 [1]
Nickel	3.98	5.0 [1]
Selenium	0.82	0.16 [1]
Silver	0.43	0.30 [1]
Sulfide	14	NA
Thallium	1.4	0.078 [1,2]
Vanadium	4.3	0.23 [1,2]
Zinc	2.61 [3]	NA

1. These concentrations are expressed in mg/L and are measured through an analysis of TCLP extract; all others are measured through a total waste analysis.
2. These constituents are only applicable as Underlying Hazardous Constituents. They are not constituents requiring treatment in F039 wastes.
3. Zinc is not an Underlying Hazardous Constituent requiring treatment in D001, D002, or D012-D043 wastes.
4. These compounds are regulated by the sum of their concentration instead of as individual constituents.

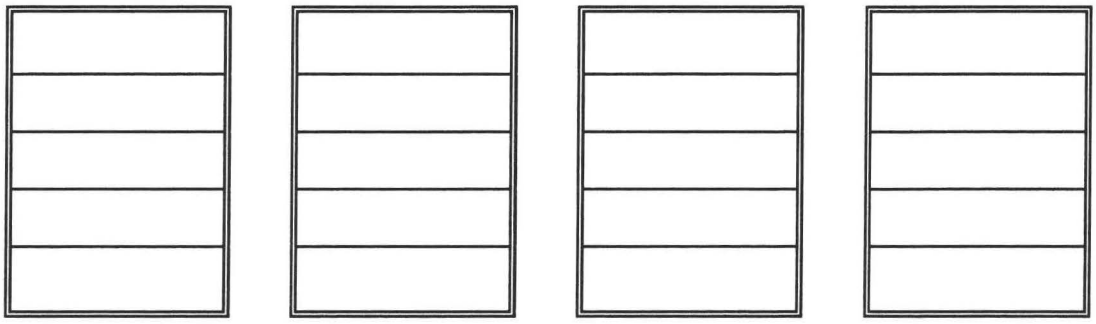
NOTE: Wastewater units are in mg/L, non-wastewater are in mg/Kg.

TABLE D
LAB PACK CERTIFICATION
(268.42, Appendix iv)

1. APPENDIX IV DRUMS:
This notification and certification applies to the following drums on this shipment. List the Lab Pack drum identification numbers below:



2. ALL DRUMS THAT MAY NOT BE PACKAGED AS APPENDIX IV TYPE LABPACKS:
The US EPA Hazardous waste codes are **D009, F019, K003, K004, K005, K006, K062, K071, K100, K106, P010, P011, P012, P076, P078, U134, U151.** The alternative treatment standard is incineration (INCIN). This notification applies to those wastes in the following drums on this shipment. List the Lab Pack drum identification numbers below:



CERTIFICATION:

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support the certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I have submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false certification, including the possibility of a fine and imprisonment.

I hereby certify that all information in this and all associated documents is complete and accurate to the best of my knowledge and information has all the necessary permits and licenses for the waste that has been identified by the profile, if approved for management.

Authorized Representative Signature: _____

Print or Type Name: Dennis Gates

Title: Hazardous Waste Handler **Date:** 03/03/09

N:\USER\FORMS\BLANKS\LAND_BAN.4

ATTACHMENT 10

MATERIAL SAFTEY DATA SHEET - POLYCOAT

(Four Pages)

nee 4 1/25/2010

SASCO CHEMICAL GROUP KP#08242-00

MATERIAL SAFETY DATA SHEET

POLYDIP 5

Date Printed: Jan 18, 2010 MSDS Effective Date : 08 FEB 08

SECTION 1 - COMPANY IDENTIFICATION

PRODUCED BY : Sasco Chemical Group, Inc.
827 Pine Ave. / P.O. Box 45
Albany, GA 31702-0045

SOLD BY:

24 Hour Emergency Telephone Number: Sasco Chemical Group, Inc. (229) 435-8394

This MSDS sheet is provided to you pursuant to 29 CFR, 1910.1200, the "OSHA Hazard Communication Standard".
This Data Sheet contains confidential product information as well as information regarding personal safety, emergency response for spills of this product, and other environmental information.
This information is for use in your facility for the intended purpose only, and is not for release to individuals outside of your facility, or to other suppliers for product comparison with out our express written consent.

SECTION 2 - PRODUCT IDENTIFICATION

Product Name : POLYDIP 5 CAS # :MIXTURE
NFPA ------- : H-1 /F-0 /R-0 /OTHER-N/A
Chemical Name: N/A
Chemical Family: Anti Tack Agent
Formula ------ : proprietary CALCIUM STEARATE

SECTION 3 - TRANSPORTATION

D.O.T. Shipping Name : N/A
Hazard Classification: N/A U.N. Number: N/A

SECTION 4 - PHYSICAL DATA

PHYSICAL DATA :

Boiling Point @ 760mm Hg: N/D 'F	Freezing Point ------ : N/D 'F
Specific Gravity (H20=1): 1.098 '	Water Solubility ---- : Dispercible
Vapor Pressure @ 20 C. : N/D	Vapor Density, (Air=1) : N/D
V O C ----- % by Volume : 0%	Evaporation Rate : N/D
pH : 6.81	(Butyl Acetate =1)

Appearance / Odor : Thick Tan Paste / Odorless

SECTION 5 - ENVIRONMENTAL / REGULATORY DATA

SARA Reportability : NO	DSL Listed or Exempt :
Report as cas # : N/A	WHMIS Information: N/A
Reportable % : N/A	Subpart Z Status : No
Sect. 313 Reportability : NO	Clean Air Act : No
Report as cas # : N/A	Carcinogenity : OSHA : N/A
Reportable % : N/A	NTP : N/A , IARC : N/A
RCRA Waste # : N/A	RCRA Reportable Qty. : N/A
HAPS Y/N : N HAPS % : N/A	EINECS # : N/A

TSCA - Components are Either Listed or Exempt --------- Y/N : Y

SECTION 6 - HAZARDOUS INGREDIENTS

TRADE SECRET AS PER 1910.1200 ** ACTIVE PERCENT IN FORMULA: **
SYNONYM: Information On This Ingredient Will Be Provided To Doctor

LD50	= N/A	ACGIH	= N/A
TLV	= N/A	PEL	= N/A
STEL	= N/A	NIOSH	= N/A
IDLH	= N/A	RTECS	= N/A
CAS#	= N/A	TSCA	= N
Hazard:	= N/A	HAPS %	= N/A
		VOC %	= N/A

NO HAZARDOUS INGREDIENTS ** ACTIVE PERCENT IN FORMULA: **
SYNONYM: N/A

LD50	= N/A	ACGIH	= N/A
TLV	= N/A	PEL	= N/A
STEL	= N/A	NIOSH	= N/A
IDLH	= N/A	RTECS	= N/A
CAS#	= N/A	TSCA	= Y
Hazard:	= N/A	HAPS %	= N/A
		VOC %	= N/A

SECTION 7 - FIRE & EXPLOSION HAZARDS

** Flashpoint: NON FLAMM.
** Flammable Limits by Air: N/A
** FIRE EXTINGUISHING METHOD:
Material Itself Is Not Combustible. If Involved In A Fire, Choose Extinguishing Agent Most Suitable For Type Of Surrounding Fire.
** FIRE FIGHTING PROTECTION:
Run-Off May Contain Hazardous Materials And Should Be Controlled If Necessary.
Wear Bunker Gear
Evacuate Down Wind
Wear SCBA (Self Contained Breathing Apparatus)
** FIRE AND EXPLOSION HAZARDS:
None Known

SECTION 8 - REACTIVITY DATA

** STABILITY: Stable
** Conditions To Avoid:
Contamination From Outside Sources May Affect The Performance Of This Product.
Mixing With Agents Listed Here May Cause An Unsafe Reaction Or Give Off Toxic Gasses.
None Known To Cause Dangerous Condition.
** BYPRODUCTS OF DECOMPOSITION:
Carbon Dioxide Or Carbon Monoxide May Be Formed.
** HAZARDOUS POLYMERIZATON: Will Not Occur.

SECTION 9 - SPILL OR LEAK PROCEDURES:

CONSULT SECTION XI FOR PROPER SAFETY EQUIPMENT
PERSONAL PROTECTION LEVELS MAY HAVE TO BE INCREASED ACCORDING TO THE SIZE OF THE SPILL AND THE HAZARDS INVOLVED.
DIKE SPILL AND PROTECT SEWER AND WATER INTAKES UNTIL YOU ARE SURE OF THE HAZARDS AND SIZE OF THE SPILL AS PER 40 CFR
VENTILATE AREA, MONITOR AIR FOR ACCUMULATION OF HAZARDOUS VAPORS
NOTIFY PROPER AUTHORITIES IF REQUIRED / FOLLOW ENVIRONMENTAL REGULATIONS
Pick Up Bulk Spilled Material With An Explosion-Proof Pump And Dispense Into A Suitable Clean, Marked Container.

SECTION 10 - WASTE DISPOSAL

Follow Local, State, And Federal Disposal Regulations.
Consult SASCO For Further Information
Dispose Of Waste In Accordance With Federal, State, And Local Law.
Incinerate At A Federally Approved Facility.

SECTION 11 - SPECIAL PROTECTION INFORMATION:

PROTECTION LEVELS SHOULD BE INCREASED ACCORDING TO USE CONDITIONS
UNCOATED TYVEK SHOULD NEVER BE USED FOR CHEMICALS.

** RESPIRATORY:
If Use Conditions Generate A Mist, Spray, Or Dust, An Appropriate NIOSH-Approved Respirator May Be Required
None Needed For Normal Use.
** SKIN CONTACT:
Neoprene Gloves
** EYE CONTACT:
Safety Glasses With Side Shields.
** VENTILATION:
Adequate For Work Area To Maintain Vapors At A Safe Level
Maintain Levels Below Any Listed TLV'S.

SECTION 12 - SPECIAL PRECAUTIONS (HANDLING AND STORAGE)

** SPECIAL PRECAUTIONS:
Do Not Transfer To Containers Not Properly Labeled For This Product. Triple Rinse Empty Container Before Disposal To Prevent Possible Chemical Reaction On Reuse
Do Not Contaminate With Dirty Equipment.
Keep From Freezing!

SECTION 13 - OTHER PRECAUTIONS:

KEEP OUT OF REACH OF CHILDREN. FOR INDUSTRIAL AND COMMERCIAL USE ONLY

SECTION 14 - HEALTH HAZARD DATA/ROUTES OF ENTRY:

** TLV AND SOURCE: N/D
** ACUTE EFFECTS OF OVEREXPOSURE
** INGESTION SYMPTOMS:
May Cause Diarrhea/Intestinal Distention/Cramps.
** SKIN ABSORPTION And/Or SKIN CONTACT:
Skin Contact May Aggravate Pre-Existing Skin Conditions.
Continued Or Repeated Contact May Cause Sensitivity And/Or Dermatitis.
** RESPIRATORY:
None Known
** EYE CONTACT:
May Cause Redness/Blurred Vision/Tearing/Burning.
** CHRONIC EFFECTS OF OVEREXPOSURE:

SECTION 15 - EMERGENCY AND FIRST AID PROCEDURES

* INGESTION:
If Vomiting Occurs Spontaneously, Hold Head Lower Than Hips To Prevent Aspiration.
Rinse Mouth Out And Spit. Do Not Swallow!
Do Not Induce Vomiting. Drink Water Or Milk. Continue Sipping Fluids Until Medical Help Is Obtained.

Keep Quiet And Treat For Shock. Do Not Speak Except To Assist In First Aid.
Never Attempt To Give Anything By Mouth To An Unconscious Person.

** SKIN CONTACT:
Remove Contaminated Clothing At Once. Blot Wet Chemical With Compatible Wipe, Or Brush Off Dry Chemical. Flush With Cold Water For At Least 15 Minutes. Monitor Victim For Recurring Symptoms.
Wash With Soap And Water. Flush With Cool Clean Water Until All Chemical Is Removed.

** RESPIRATORY:
Remove To Fresh Air. Loosen Tight Clothing. Treat For Shock. Give CPR If Necessary. Keep Warm And Quiet.

** EYE CONTACT:
Get Water Into Eyes Immediately. Holding Eyelids Apart, Continue Flushing Until Medical Help Is Found. Chemical Antidote Should Only Be Given By A Physician.

** NOTES TO PHYSICIAN:
None Known

SECTION 16 - OTHER PERTINENT PRODUCT INFORMATION:

NOTE: WHILE SASCO BELIEVES THAT THE DATA CONTAINED HEREIN IS FACTUAL AND THE OPINIONS EXPRESSED ARE THE RESULTS OF THE TESTS CONDUCTED, THE DATA IS NOT INTENDED TO BE TAKEN AS A WARRANTY OR REPRESENTATION FOR WHICH S & S COMPANY ASSUMES LEGAL RESPONSIBILITY. THEY ARE OFFERED SOLELY FOR YOUR CONSIDERATION, INVESTIGATION AND VERIFICATION. ANY USE OF THESE DATA AND INFORMATION MUST BE DETERMINED BY THE USER TO BE IN ACCORDANCE WITH APPLICABLE FEDERAL, STATE AND LOCAL REGULATIONS.

ABBREVIATIONS : N/D - Not Determined
N/A - Not Applicable

ATTACHMENT 11

USED OIL SHIPPING PAPER

(One Page)

NORSOLV SYSTEMS
Environmental Services
1000 RAINBOW DRIVE
POST OFFICE BOX 418
WATERLOO, IOWA 50704-0418
319-234-5585 • 800-772-1724 • FAX 319-234-5580

NORTHLAND
MOTOR OILS • LUBRICANTS
NORTHLAND PRODUCTS COMPANY

ISO 9001 Registered Quality Management System
ISO 14001 Registered Environmental Management System
US EPA ID NUMBER IAD022365480

DOCUMENT NO.
593198

BILL TO

SERVICE LOCATION
Hennigs Automotive
Keokuk, Ia

MEMO:

WEEK OF	GENERATOR'S US EPA ID NO.	CUSTOMER NO.	P.O. NUMBER	DAY SERVICED
				8 / 13 / 09

STOCK NO.	DESCRIPTION	QUANTITY	COMP. #
	Used oil pickup	2681 gals	#1, 2

Delivery of Empty Containers

	Drums	Totes
Used Oil Filters		
Used Antifreeze		
Used Oil		
Used Absorbents		

Ind. 319-415-9779

Pickup of Full Containers

	Drums	Totes	Gallon Quantity
Used Oil Filters			
Used Antifreeze			
Used Oil			
Used Absorbents			

DISPOSAL RESTRICTION NOTIFICATION:
IN ACCORDANCE WITH NORTHLAND PRODUCTS CO. AND NORSOLV SYSTEMS ENVIRONMENTAL POLICIES AND PROCEDURES, ALL WASTES ARE BENEFICIALLY RECYCLED, USED FOR ENERGY RECOVERY OR DESTRUCTED BY INCINERATION, IN FULL COMPLIANCE WITH ALL FEDERAL, STATE AND LOCAL REGULATIONS. NO WASTE IS DISPOSED OF IN ANY LANDFILL OR NAVIGABLE WATERS OF THE UNITED STATES. ADDING OR CO-MINGLING ANY FORM OF HAZARDOUS WASTE TO NON-HAZARDOUS WASTE STREAMS IS PROHIBITED.

GENERATOR COMPLIANCE CERTIFICATION:
AS THE GENERATOR OF THESE PRODUCTS, GENERATOR HEREBY CERTIFIES THAT NO FORM OF HAZARDOUS WASTE WAS CO-MINGLED, MIXED WITH OR ADDED TO THIS/THESE PRODUCTS. GENERATOR ACKNOWLEDGES ANY MISREPRESENTATION OF THIS SECTION IS AN ACTIONABLE EVENT THAT WILL EXPOSE GENERATOR TO ADDITIONAL COSTS, PENALTIES AND/OR ENFORCEMENT ACTIONS.

GENERATOR SIGNATURE: _____

CUSTOMER SIGNATURE: _____ NORSOLV SIGNATURE: _____

Attachment 11

ATTACHMENT 12

NON-HAZARDOUS WASTE MANIFESTS

(Four Pages)

NON-HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12 pitch) typewriter)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: IAD005136023015 48

Manifest Document No.: L01548

2. Page 1 of 1

3. Generator's Name and Mailing Address: Henniges Automotive, 3200 Main Street, Keokuk, IA 52632

4. Generator's Phone (319) 524-4560

5. Transporter 1 Company Name: ENVIROVAC WASTE TRANSPORT SYSTEMS

6. US EPA ID Number: ILR000019588

A. State Transporter's ID

B. Transporter 1 Phone: (217)245-0460

7. Transporter 2 Company Name

8. US EPA ID Number

C. State Transporter's ID

D. Transporter 2 Phone

9. Designated Facility Name and Site Address: Badger Disposal of WI., Inc., 5611 W. Hemlock Street, Milwaukee, WI 53223

10. US EPA ID Number: WID988580056

E. State Facility's ID

F. Facility's Phone: (414) 760-9175

11. WASTE DESCRIPTION	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.
a. NON-REGULATED MATERIAL	17	D F	859	G
b. NON-REGULATED MATERIAL	27	D F	13591	G
c. NON-REGULATED MATERIAL	15	D M	82591	G
d. NON-REGULATED MATERIAL	5	D M	275	G

17 + 44 + 8 = 69

9

G. Additional Descriptions for Materials Listed Above
A: WS021207; EMRALON TW-040
B: WS021206; EMRALON TW-090
C: WS015318; Oil Sludge
D: WS011876; Kool-ALL 940

H. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

Bill to: HEI Consultants
(414) 236-1080

16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.

Printed/Typed Name	Signature	Date (Month / Day / Year)
Dennis Gates	Dennis Gates	12 / 01 / 09

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month / Day / Year)
James Piperniel	James Piperniel	12 / 01 / 09

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month / Day / Year)
		/ /

19. Discrepancy Indication Space

20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.

Printed/Typed Name	Signature	Date (Month / Day / Year)
Ron Mitchell	Ron Mitchell	12 / 3 / 09

NON-HAZARDOUS WASTE — GENERATOR — TRANSPORTER — FACILITY

NON-HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12 pitch) typewriter)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: IAD005136023015 49

Manifest Document No.: 101549

2. Page 1 of 1

3. Generator's Name and Mailing Address:
Henniges Automotive
3200 Main Street
Keokuk, IA 52632

4. Generator's Phone (319) 524-4560

5. Transporter 1 Company Name: ENVIROVAC WASTE TRANSPORT SYSTEMS

6. US EPA ID Number: ILR000019588

A. State Transporter's ID

B. Transporter 1 Phone: (217)245-0460

7. Transporter 2 Company Name

8. US EPA ID Number

C. State Transporter's ID

D. Transporter 2 Phone

9. Designated Facility Name and Site Address:
Badger Disposal of WI., Inc.
5611 W. Hemlock Street
Milwaukee, WI 53223

10. US EPA ID Number: WID988580056

E. State Facility's ID

F. Facility's Phone: (414) 760-9175

11. WASTE DESCRIPTION	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt./Vol.
a. NON-REGULATED MATERIAL	1	DM	55	G
b.				
c.				
d.				

G. Additional Descriptions for Materials Listed Above
A: W8006251, Used Anti-Freeze
B:
C:
D:

H. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Bill to: HEI Consultants
(414) 236-1080

16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.

Printed/Typed Name	Signature	Date: Month	Day	Year
Dennis Gates	Dennis Gates	12	01	09

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date: Month	Day	Year
James Riparinen	James Riparinen	12	01	09

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date: Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.

Printed/Typed Name	Signature	Date: Month	Day	Year
Ken Mitchell	Ken Mitchell	12	3	09

GENERATOR

TRANSPORTER

FACILITY

NON-HAZARDOUS WASTE

ALLIED WASTE INDUSTRIES, INC.

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	137770
[illegible]			

GENERATOR

3. Generator's Name and Mailing Address
Hamilgas
3300 Main
Keokuk IA 52632

4. Generator's Phone ( ) 319 524 4500

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter's Phone
Allied Waste Svc.		(217) 223-4100
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter's Phone
9. Designated Facility Name and Site Address Bucktridge Landfill 28205 State Hwy B, P.O. Box 450 LaGrange, MO 63448	10. US EPA ID Number	C. Facility's Phone (573) 655-4240

11. Waste Shipping Name and Description	12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol
a. LT&Y14830 - Carbon Black, Limestone, Talc				
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

TRANSPORTER

16. **GENERATOR'S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed / Typed Name	Signature	Month	Day	Year
		7	16	16

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed / Typed Name	Signature	Month	Day	Year
		7	16	16

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed / Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed / Typed Name	Signature	Month	Day	Year

GENERATOR'S COPY

AWI Form # 121

ALLIED WASTE INDUSTRIES, INC.

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. IAD005136023 | Manifest Document No. 10.00C.1 | 2. Page 1 of 1 | 137767

3. Generator's Name and Mailing Address
Henniges
3200 Main
Keokuk, IA 52632
4. Generator's Phone ( ) (319) 524-4560

5. Transporter 1 Company Name: Allied Waste Svc. | 6. US EPA ID Number | A. Transporter's Phone: (217) 223-4100

7. Transporter 2 Company Name | 8. US EPA ID Number | B. Transporter's Phone

9. Designated Facility Name and Site Address
Backridge Landfill
26265 State Hwy B, PO Box 430
LaGrange, MO 63448
10. US EPA ID Number | C. Facility's Phone: (573) 655-4240

11. Waste Shipping Name and Description	12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol
a. L76Y14830 - Carbon Black, Limestone, Talc	1	Yd		
b. L76Y31011 exhaust Filters	1	Yd		
c. L76Y15945 Absorbents with oil	1	Yds		
d. L76Y14831 Carbon black	2	Yds		

D. Additional Descriptions for Materials Listed Above

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
89110 (7.12 ton)

16. **GENERATOR'S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.
Printed / Typed Name: Dennis Gates | Signature | Month 3 | Day 10 | Year 10

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed / Typed Name: Les Norem | Signature | Month 3 | Day 10 | Year 10

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed / Typed Name | Signature | Month | Day | Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed / Typed Name: Derek K Lovinger | Signature | Month 3 | Day 10 | Year 10

GENERATOR TRANSPORTER FACILITY

ORIGINAL-RETURN TO GENERATOR

AWI Form # 121

Attachment 12 Page 4 of 4

ATTACHMENT 13

PARTS WASHER SOLVENT INVOICE/SHIPPING PAPER

(One Page)

NORSOLV SYSTEMS
Environmental Services
1000 RAINBOW DRIVE
POST OFFICE BOX 418
WATERLOO, IOWA 50704-0418
319-234-5585 • 800-772-1724 • FAX 319-234-5580

NORTHLAND
MOTOR OILS • LUBRICANTS
NORTHLAND PRODUCTS COMPANY

MANIFEST NO.
337588

BILL TO

HENNIGES AUTOMOTIVE
PO BOX 516042
LIVONIA MI 48151

SERVICE LOCATION

METZELER AUTOMOTIVE
PROFILE SYSTEMS
3200 MAIN STREET
KEOKUK IA 52632

MEMO: 3195244360

SERVICE REP	RICH

WEEK OF	GENERATOR'S US EPA ID NO.	CUSTOMER NO.	P.O. NUMBER	DAY SERVICED	LAST SERVICED
3/11/09	IAD025136823	5943679	8280857	3/9/09	01/14/09

STOCK NO.	SERVICE DESCRIPTION	SERIAL NO.	UNIT PRICE
8808E	SERVICE DM 30 A WEEK	29935	155.45
8808Z	SERVICE DM 16 A WEEK	5279	103.45

TRANSPORTER 1 COMPANY NAME
NORTHLAND PRODUCTS COMPANY

US EPA ID NUMBER
I.A.D.0.2.2.3.6.5.4.8.0

DESIGNATED FACILITY NAME AND SITE ADDRESS
NORTHLAND PRODUCTS COMPANY
1000 RAINBOW DRIVE
WATERLOO, IOWA 50704

US EPA ID NUMBER
I.A.D.0.2.2.3.6.5.4.8.0

SUB TOTAL	258.90
STATE TAX	15.53
OPTION TAX	2.59
TOTAL	277.02

US DOT DESCRIPTION (INCLUDING PROPER SHIPPING NAME, HAZARD CLASS, AND ID NUMBER)	CONTAINERS NO.	CONTAINERS TYPE	TOTAL QUANTITY	UNIT VOL
WASTE COMBUSTIBLE LIQUID, N.O.S., (CONTAINS PETROLEUM NAPHTHA), COMBUSTIBLE LIQUID, NA 1993, PG III, (EPA D001, D018, D039) ERG #128	2	DRUMS	30	GAL.

AND DISPOSAL RESTRICTION NOTIFICATION: IN ACCORDANCE WITH EPA 40 CFR 268.7, THE GENERATOR PROVIDES NOTICE THAT THE MATERIAL REFERENCED ABOVE - WASTE COMBUSTIBLE LIQUID, EPA CLASS D001 - HIGH TOC IGNITABLE LIQUIDS ARE LAND DISPOSAL RESTRICTED WASTES AND ARE SUBJECT TO THE FOLLOWING TECHNOLOGY-BASED STANDARDS/CODES: FSUBS; RORGS; OR INCIN. SEE TECHNOLOGY-BASED STANDARDS(S) IN 40 CFR 268.42, TABLE 2 - TECHNOLOGY-BASED STANDARD BY RCRA WASTE CODES.

IN EVENT OF EMERGENCY CALL:
1-800-424-9300 (24 HOURS)
CHEMTREC

CERTIFY THAT MY TOTAL WASTE STREAMS ARE WITHIN ONE OF THE FOLLOWING CATEGORIES:
☐ 0-220 LBS PER MONTH _____. ☐ 220-2200 LBS PER MONTH _____. ☐ GREATER THAN 2200 LBS PER MONTH _____.

ALSO CERTIFY THAT NO MATERIAL CHANGE HAS OCCURRED EITHER IN THE CHARACTERISTICS OF THE WASTE MATERIALS OR IN THE PROCESS GENERATING THE WASTE MATERIAL.

RECEIVED BY: _____ SERVICED BY: _____